

**Environmental  
Protection Agency**

Governor  
Lt. Governor  
Director

August 2, 2011

RE: SWAGELOK MANUFACTURING CO LLC  
3GR00777\*BG  
STORMWATER  
CUYAHOGA

Mr. Chris Rhodes  
Environmental and Safety Manager  
Swagelok  
31500 Aurora Road  
Solon, OH 44139

Dear Mr. Rhodes:

On August 1, 2011 this writer conducted an inspection of your facility, located at 6050 Cochran Road, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activities #OHR000004 referenced above. Michelle Hummel, also of the Ohio EPA Division of Surface Water, was present for this inspection. As representatives of Swagelok, Bob Bibby, Neil Hoffman, David Barr, and yourself were present for the inspection as well. Along with our observations from the inspection we have provided comments concerning your permit below:

General:

1. This site is the location of Swagelok Manufacturing Co., a company that machines stainless steel nuts and ferrules.
2. All indoor drains are either capped or directed to sanitary sewer.

Inspection Observations:

1. The steel chip dumpsters on the south side of the building were in need of attention at the time of inspection. Chips and oil staining had built up on the cement in the surrounding area with a susceptible storm drain located a few feet away. Only pure, unpolluted water may enter the storm drain. This storm drain did have an instillation which had the same basic functionality as a valve, allowing the drain to be closed off. It is recommended that this area be swept more frequently and that the storm drain be left closed. Once water accumulates in the area, the collected water can then be examined for pollutants. If the accumulated water is clean, the drain may be opened and the water released. If the water is contaminated, oils should be absorbed off the top and solids settled out and collected before releasing or the water could be collected and sent to disposal facility off site. As a long term solution, a roof or a bermed enclosure could be constructed around the hoppers to prevent the spread of oil and chips. As discussed, this addition of a more sheltered area for the hoppers could make the facility eligible to apply for No Exposure status in place of the NPDES general permit.

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Permit:

1. As required in Part IV.D.3.g of the NPDES permit, the Storm Water Pollution Prevention Plan (SWPPP) must include a Non-Storm Water Discharges Certification stating that the discharge has been tested or evaluated (this does not necessarily require discharge sampling) for the presence of non-storm water discharges. At the time of inspection the Non-Storm Water Discharges form in the SWPPP was not complete. This form should be completed and kept with the SWPPP for review.

Action Items

- Make improvements to the chip dumpster area so that chips and oil cannot enter the storm sewer system.
- Complete the Non-Storm Water Discharges form in the SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than August 19, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email [kelly.mcvay@epa.ohio.gov](mailto:kelly.mcvay@epa.ohio.gov). Should you have further questions after August 12, 2011, please contact Dan Bogoevski, also of the Division of Surface Water, at (330) 963-1145 or by email at [dan.bogoevski@epa.ohio.gov](mailto:dan.bogoevski@epa.ohio.gov).

Sincerely,



Kelly A. McVay  
Assistant to the District Engineer  
Division of Surface Water

KAM/mt

cc: Bob Bibby, Site Manager, Swagelok  
Neil Hoffman, Environmental & Safety Supervisor, Swagelok  
David Barr, Environmental & Safety Coordinator, Swagelok

ec: Dan Bogoevski, Ohio EPA, NEDO, DSW  
Michelle Hummel, Ohio EPA, NEDO, DSW