

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

July 28, 2010

RE: UNIVERSAL DISPOSAL
NPDES# 3GR01293*DG
STORMWATER
GEAUGA COUNTY

Mr. Murl Clemson
Universal Disposal
9954 Old State Road
Chardon, OH 44024

Dear Mr. Clemson:

On July 15, 2010 this writer conducted a follow-up inspection of your facility, located at 9954 Old State Road in Chardon, to determine compliance with your Industrial General Storm Water NPDES permit referenced above and to observe the implementation of stormwater controls outlined in your SWPPP. Along with my observations from the inspection I have provided comments concerning your SWPPP below:

Inspection Observations:

1. One area of concern observed during the inspection is the area where wood is ground and dyed to create mulch. This area is currently surrounded on three sides by concrete blocks and a clay berm to prevent runoff and to contain the mulch piles. The inspection revealed that some mulch had spilled over the concrete blocks and into the area outside of the contained mulching area. There was discussion about adding an additional layer of concrete blocks to prevent overspill. This would help prevent mulch from spilling outside the contained area and being transported to the westerly pond due to stormwater runoff. This area also had noticeable ponding of water and dye near the grinding machine and should be cleaned to avoid runoff.
2. Storm drains inside maintenance and storage garages have been plugged as previously advised.
3. The fuel station adjacent to the mulching area had visible oil residue on the ground outside of the secondary containment dike that surrounds the tank. This area should be cleaned up and a spill kit should be placed near the station for use in the event of a spill in the future. Also, the plug for the dike had been removed and should be replaced to further prevent the discharge of pollutants.

4. The area around the finished product storage had evidence of product being carried toward the nearby pond due to runoff. This can be decreased by regularly sweeping the mulch back into the storage piles. Also, there was discussion about adding a berm along the end of the paved area near the storage piles. The addition of a berm would further prevent the chance of finished product being transported into the pond during a rain event.
5. Spill kits should be added to the following areas: inside all maintenance and storage garages, the fuel station adjacent to the mulching area, the fuel station with buried tanks and above-ground pumps, and inside the solid waste transfer building.
6. Currently, washing of vehicles takes place inside one of the garages. Wash water is then pumped and transported to a treatment facility. During the inspection there was mention of the future intent to construct a holding tank to contain the wash water until it can be pumped and treated. As a reminder, the installation and design of this holding tank will require a Permit to Install from the Ohio EPA.
7. Concrete grinding produces excess water that may possibly contain fine concrete dust and sediment. At the time of inspection there was no noticeable sediment in the standing water around the equipment. If the grinding was to produce a large amount of concrete fines it would be advised that the runoff was directed into a sediment trap or sediment pond rather than directly discharging into a ditch or stream.

Storm Water Pollution Prevention Plan:

1. Include on the cover page your NPDES permit number and your SIC code.
2. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees. This information can be added as an appendix to the plan.
3. Monthly inspections should be conducted. Records of the inspections should be maintained in the SWPPP.
4. The SWPPP needs to be updated to include current staff members that will be part of the Pollution Prevention Team.
5. The site map needs to be updated and necessary changes need to be made.
 - a. Identify and locate on map all stormwater outfall location points with designated number (e.g. 001, 002, etc.)
 - b. Locations of spill kits.
 - c. Overall drainage patterns (which areas drain into each outfall).

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- d. Potential sources of pollutants clearly identified on plan or by use of key.
- e. Site acreage with estimate of impervious surface vs. pervious surface.

Action Items

- Place spill kits at the above mentioned locations.
- Update your SWPPP.
- Replace the drainage plug on the fuel tank's secondary containment.
- Consider placing a berm along the edge of the paved area near the finished product.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 487-1708 or by email cory.harris@epa.state.oh.us.

Sincerely,



Cory Harris
Assistant to the District Engineer
Division of Surface Water

CH/mt

cc: Dan Bogoevski, Ohio EPA, DSW, NEDO
Laura Weber, Ohio EPA, DSW, NEDO
Dave Dysle, Ohio EPA, DSIWM, NEDO
Chad Eldridge, Hess & Associates Engineering Inc.



Figure 1 – The plug on the secondary containment dike for the fuel station had been removed.



Figure 2 – Oil residue is present near the fuel station.



Figure 3 – Water and dye ponding near the mulch grinder.



Figure 4 – Residual dye and water was present outside of mulching area.



Figure 5 – Finished product area had evidence of runoff into adjacent pond.