

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

August 16, 2011

RE: ASHTABULA COUNTY
CITY OF JEFFERSON
WORTHINGTON CYLINDERS
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR00800*DG
INDUSTRIAL STORM WATER

Mr. Roger Downey
Worthington Cylinders
863 State Route 307 East
Jefferson, OH 44047

Dear Mr. Downey:

On August 3, 2011, Ohio EPA conducted an inspection of Worthington Cylinders, located at 863 State Route 307 East, City of Jefferson, Ashtabula County (facility). During the inspection, the facility was represented by Shelly DeGennaro, HR/EH&S Manager; Jeff Priestap, Senior Production Supervisor; and, via telephone, Elaine Veth, Regional Environmental Representative. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR00800*DG. The inspection documented the following:

General Information

The facility manufactures low pressure cylinders produced to Department of Transportation and various specifications for use in commercial and residential applications. Ms. Veth provided that the facility's industrial activities are currently classified under U.S. Department of Labor's Occupational Safety and Health Administration's Standard Industrial Classification (SIC) Code 3443: Fabricated Plate Work (Boiler Shops). The facility currently employs approximately 190 employees over three shifts.

Storm Water Pollution Prevention Plan (SWP3)

- Section II of the SWP3 establishes the EH&S Manager as pollution prevention team for the facility. The SWP3 must be revised to include the specific contact information for each member of the pollution prevention team;
- Section IV of the SWP3 details that a site plan illustrating the plant, property, and drainage can be located in Attachment A. A facility diagram is provided in Figure

A-2. Unfortunately, the facility diagram does not satisfy all of the requirements established within Part IV.D.2.a of the General Storm Water Permit. The SWP3 must be revised to include all of the required site map information;

- Section VIII of the SWP3 details that inspections will be conducted “regularly” by the EH&S Manager to ensure proper management of equipment, raw materials, finished goods and waste products. The SWP3 must be revised to clarify the term “regularly” and establish a formal inspection frequency (i.e. annually, semi-annually, quarterly, monthly, weekly, daily, etc.);
- Section VIII of the SWP3 details that storm water pollution prevention plan training will be given to all plant employees. Storm water pollution prevention plan employee training is not occurring. The SWP3 must be revised to establish an employee training frequency (i.e. annually, semi-annually, quarterly, monthly, weekly, daily, etc.). In addition, training of employees in storm water pollution prevention must be initiated immediately; and
- The SWP3 does not address best management practices (BMP) to be implemented at the west side back pad (WSBP) utilized as a used oil storage area. The SWP3 must be revised to incorporate the WSBP and BMPs utilized/implemented to prevent the potential discharge of pollutants in storm water runoff.

Facility Inspection

The facility’s SWP3 must be revised to incorporate or install best management practices (BMP) necessary to address the following deficiencies:

- Section V, Table 2 of the SWP3 provides the comprehensive list of exposed materials handled on-site. The inspection documented that 1,000 gallon waste oil totes are stored in locations that are exposed to precipitation events (Figures 1 to 2). Table 2 does not include the 1,000 gallon waste oil totes on the list. The SWP3 must be revised to include the 1,000 gallon waste oil tote storage locations and the appropriate BMPs that will be implemented to prevent potential pollutants from being discharged in storm water runoff;
- Section V, Table 2 of the SWP3 details that scrap steel is stored in hoppers and roll-off containers. The BMPs implemented to address the scrap steel hoppers and roll-off containers are that the area is to be kept clean and orderly and the hoppers and roll-off containers are to be maintained in a state of good repair. Scrap steel and soil waste materials were present on the ground in the storage

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area (Figure 3). Good housekeeping activities (i.e. sweeping, removal, etc.) must be increased to prevent the potential to discharge pollutants in storm water runoff; and

- The inspection documented that the scrap steel hoppers contained solid waste and contained contaminated storm water (Figures 4 to 5). When I questioned how the contaminated storm water is managed, Ms. DeGennaro and Mr. Priestap were unsure of the management procedures. The contaminated storm water must be addressed via either pumping to a sanitary sewer for treatment at a waste water treatment plant or collected by a contractor for proper disposal. Ohio EPA recommends that the scrap steel hoppers and roll-off containers be tarped or relocated under cover to prevent precipitation events from contacting pollutants.

Within thirty days of receiving this correspondence, please submit a copy of the facility's revised SWP3 and a letter detailing the corrective actions that have been implemented to address the above deficiencies. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via email chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Elaine Veth, Regional Environmental Representative, Worthington Industries



Figure 1 – 1,000 gallon waste oil totes are stored in a location that is exposed to precipitation events.



Figure 2 – 1,000 gallon waste oil totes are stored in a location that is exposed to precipitation events.

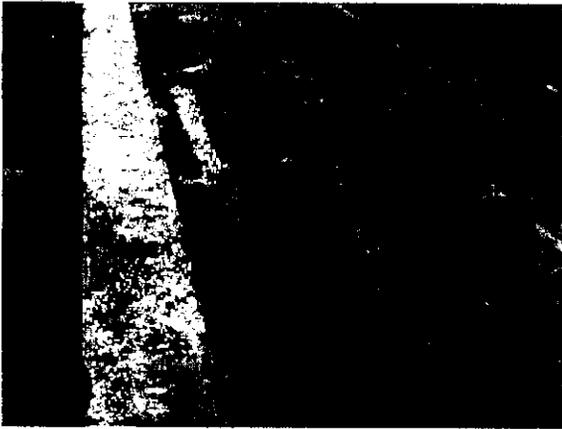


Figure 3 – Scrap steel and soil waste materials were present on the ground in the storage area.



Figure 4 - Scrap steel hoppers contained solid waste and contained contaminated storm water.



Figure 5 - Scrap steel hoppers contained solid waste and contained contaminated storm water.