



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 12, 2011

RE: TRUMBULL COUNTY
HOWLAND TOWNSHIP
NPDES PERMIT #OHC000003
OEPA PERMIT #3GC04924*AG
FLEX-STRUT
CONSTRUCTION STORM WATER

Ms. Dale Gebhardt
Flex-Strut Inc.
2900 Commonwealth Ave NE
Warren, OH 44483

Dear Mr. Gebhardt:

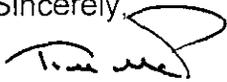
On June 15, Ohio EPA conducted an inspection of the Flex-Strut project located at 2900 Commonwealth Ave. NE, Howland Township, Trumbull County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC04924*AG. I was accompanied by Jake Gore of Trumbull County SWCD. The inspection documented the following:

- The detention basin and the area surrounding it need to be permanently stabilized. It appears that seeding and mulch has been distributed once before, but did not take very well due to winter conditions, harsh weather, etc. Please be sure to stabilize immediately with respect to seeding specifications in the Storm Water Pollution Prevention Plan (SWP3) to avoid excessive erosion (See Figures 1 & 2).
- The area by loading docks eleven through fourteen (11-14) needs to be permanently stabilized. Again, it appears that seeding and mulch has been applied once before, but did not take very well due to harsh conditions. Please be sure to stabilize this area with respect to seeding specifications in the SWP3 to prevent sediment laden water from discharging to surface waters of the State (See Figures 2 & 3).
- There appears to be slag leachate (appears milky white) polluting the storm water runoff from the Flex-Strut site. The outlet behind the building by loading docks eleven through fourteen (11-14) is discharging this polluted water and is in direct violation of the NPDES permit. Please be sure this issue is resolved and that the water discharged from this outlet is not polluted with leachate (See Figures 4&5).

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A written report detailing how the above deficiencies will be addressed must be submitted to Ohio EPA within seven days of receiving this letter. The above deficiencies must be addressed within 14 days of receiving this letter. Also, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,



Tim McParland
Assistant to the District Engineer
Division of Surface Water

TM/mt

cc: Jake Gore, Trumbull County SWCD
Howland Township Board of Trustees

ec: Chris Moody, Ohio EPA, NEDO, DSW



Figure 1: The detention basin is not stabilized.

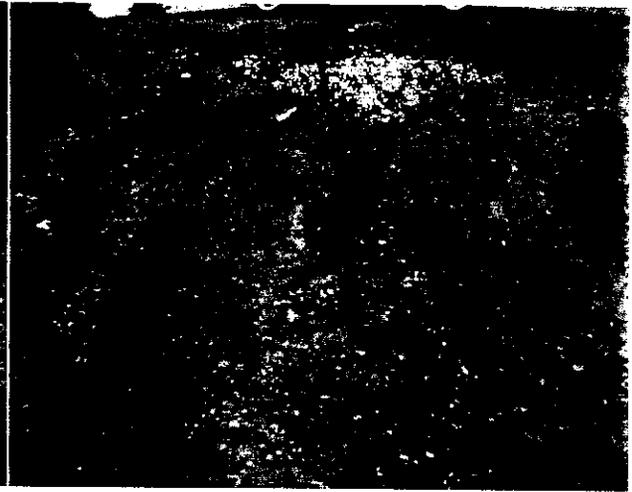


Figure 2: Excessive erosion is visible on the embankments of the detention basin.



Figure 3: Area behind loading docks 11-14 is not stabilized.

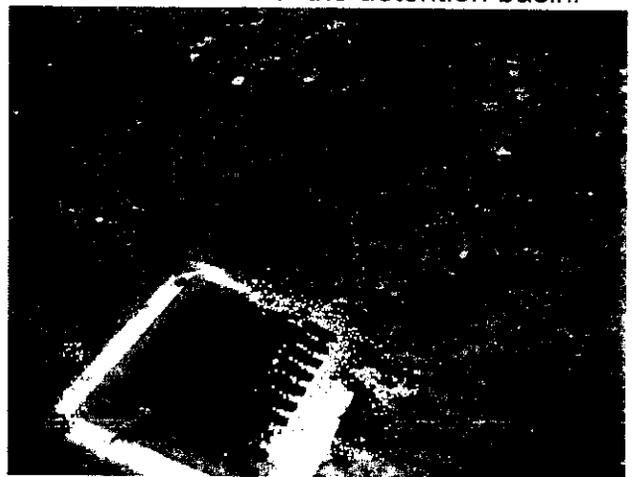


Figure 4: Erosion is apparent and sediment is entering a catch basin.



Figure 5: Possible slag leachate is polluting the runoff from the site.



Figure 6: Milky-white leachate coming from the outlet by loading docks 11-14.

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