



**Environmental  
Protection Agency**

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

December 8, 2011

Ms. Maria Cruset  
Compliance Manager, Clean Water Limited  
300 Cherokee Drive  
Dayton, OH 45417

**RE: No Exposure Certification for Clean Water Ltd's Cherokee Drive Facility**

Dear Ms. Cruset:

I am in receipt of Mr. Billy Huston's August 9, 2011 cover letter and completed No Exposure Certification form for Clean Water Limited's (CWL) Dayton, OH, facility located on Cherokee Drive. Based on the findings of my May 19, 2011 site inspection (during which Mr. Huston represented CWL), discussions that occurred during the inspection, and a couple of minor changes made to the site's operations following the visit, CWL's Cherokee Drive facility appears to qualify for a no exposure certification.

Because of its status as a commercial hazardous waste management facility, a brief narrative of the following aspects of the site's operations must be submitted to accompany the completed no exposure form. In particular, the narrative, which can use existing language from other site plans if appropriate, should include the following:

1. Provide volumetric capacities for transfer pads A & B and containment pads A, B, and C. Explain that these areas are plumbed to an on-site treatment facility which processes any rainwater that lands within in them before it is discharged to Montgomery County's western regional wastewater treatment plant. Explain how accumulated water in these areas would be conveyed to the on-site treatment system if electrical service to the facility was to be interrupted during a storm.
2. Change the verbiage on the current diagram (found near transfer pad "B") stating "all stormwater on this pad is pumped back into the system" to something like "all stormwater that collects in transfer pads A and B and containment pads A, B and C is pumped to an on-site treatment works, then discharged to Montgomery County's western regional WWTP.
3. Provide a site map that shows the location of storm drains in paved areas adjacent to waste management units. Clarify the site's address on this map. (The version Mr. Huston provided to me shows the address as 300 S. West End Avenue.) It also refers to the site as "Perma-Fix of Dayton, Inc.", so this should be updated, too.

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4. The site diagram should be larger in scale, and should show the entire property surrounding the active part of the facility.
5. The narrative accompanying the site map should explain that all waste processing activities occur indoors and out of the weather, and indicate on the map specifically where each activity occurs. The narrative should also discuss specific outdoor locations (i.e., tank farms) at which materials/waste are transferred. The last part of this narrative should discuss emergency preparedness at the site as it would apply to a leak or spill of waste that could potentially leave the site in stormwater runoff.

In general, the requested narrative should be written so that it is not overly technical. It needs to clearly state, by addressing the specific points outlined above, why CWL's Dayton plant can justify opting out from the requirement to obtain industrial stormwater permit coverage.

If you have questions about anything in this letter, I can be reached at 937.285.6442 or via email at [chris.cotton@epa.ohio.gov](mailto:chris.cotton@epa.ohio.gov).

Sincerely,



Chris Cotton  
Division of Surface Water

CC/tf

cc: OEPA/SWDO/DSW Files  
Michael Joseph, OEPA/CO/DSW