Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 8, 2012

RE: WAYNE COUNTY
CITY OF ORRVILLE
INDUSTRIAL STORM WATER
THE SCOTTS CO, LLC

Mike Henkle
The Scotts Co., LLC
563 South Crown Hill Rd.
Orrville, OH 44667

Dear Mr. Henkle:

On April 25, 2012, I performed a compliance inspection of storm water best management practices (BMPs) at the above referenced site. I was accompanied by Mandy Razzano of our Division of Surface Water and Clarisa Gereby of our Division of Materials and Waste Management. We met with you, the plant manager for the Orrville facility, and David Jacoby and Bill Lechner of Scotts Environmental, Health and Safety Department. Midway through our inspection, we were joined by Gayle Fratto, also with Scotts Environmental, Health & Safety. Our records indicate that Scotts Co. has recently submitted a Notice of Intent (NOI) to renew coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activities No. OHR000005.

Storm Water Permitting

Storm water discharges associated with industrial activity from this facility were authorized under the previous generation of this general NPDES permit and the facility permit number assigned was 3GR01039*DG. Although this permit listed the facility address as 2168 S. Crown Hill Rd., it should be noted that the NOI submitted to renew coverage lists the facility address as 563 S. Crown Hill Rd. Scotts stated that their facility spreads across several parcels with various addresses, but their intention is to operate this facility under a singular storm water permit and storm water pollution prevention plan (SWPPP). Thus, when Ohio EPA issues an authorization letter in response to the recently submitted NOI, that permit number will authorize storm water discharges from all of Scotts industrial activities located at the SW corner of South Crown Hill Rd and Schrock Rd in Orrville.

Storm Water Pollution Prevention Plan (SWPPP)

Operations at this site consist of three major activities: fertilizer mixing, potting soil (growing media) production, and a distribution warehouse. The facility is primarily described by Standard Industrial Classification (SIC) Code 2875: Fertilizers, Mixing Only. As such, Scotts is subject to the sector-specific requirements contained within Part 8.C of general NPDES permit No. OHR000005 (Sector C1). It should be noted that Scotts also operates a vehicle maintenance shop and fueling station at the Orrville facility. As such, in addition to the requirements pertaining to Sector C1, Ohio EPA believes the SWPPP for this facility must include BMPs to address the requirements of Part 8.P of the NPDES permit pertaining to land transportation and warehousing. Note that this does not affect the information submitted on the NOI or place any additional benchmark monitoring requirements on this facility. Rather, it provides more targeted BMP selection criteria for those portions of the site engaged in vehicle maintenance and equipment cleaning.

A copy of the SWPPP was located on site and Ohio EPA verified that Scotts did conduct a Comprehensive Site Evaluation in 2011. Scotts also conducts more frequent routine facility inspections. A review of the Site Map indicates that there are seven distinct storm water outfalls at this facility. However, upon review in the field, it appears that the drainage map may need revision to more accurately depict drainage area boundaries. In particular, there appear to be inconsistencies between what was observed in the field and what is depicted on the Site Map for Drainage Areas 2 and 3. There were also inconsistencies with the area labeled Overland Flow to Creek. The map indicates there is no outfall, but this area is directed to the detention basin serving Drainage Area 5. Thus, this area is really part of Drainage Area 5. Further, the Site Map lacks a complete depiction of all storm water conveyances including catch basins, ditches, pipes and swales. Please review Part 5.1.2 of general NPDES permit No. OHR000005 for a complete description of the Site Map and revise accordingly. Scotts was reminded that the SWPPP for this facility must be updated to address the requirements of general NPDES permit No. OHR000005 within 180 days of its effective date, which is on or about July 1, 2012. Scotts stated that they were in the process of updating the plan.

Site Inspection

Our inspection revealed the following storm water pollution concerns:

- **Staining on the pavement was observed outside the Maintenance Shop and along the loading docks of the Distribution Center.** If vehicles must be parked outside the Maintenance Shop to await repair, drip pans or absorbent pads should be placed under leaks to prevent pollutants from reaching the pavement. If leaks do fall onto the pavement, Oil Dri or other such absorbent should be used to clean up the material promptly. You may also want to consider installation of an oil and water separator to pretreat runoff from the loading dock area of the Distribution Center before it enters the detention basin. Vehicles should be inspected regularly to identify those that are leaking and need repair. Repair should occur promptly.

Please review the concerns noted above and provide me with a letter of response indicating the actions you have taken to address them. **Please provide a response by May 31, 2012.** For actions not completed by that date, provide me with your plan of action and a schedule to complete it. Submit a copy of the updated SWPPP by July 1, 2012.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,

Dan Bogoevski

Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Gayle Fratto, Scotts Co LLC
Bill Lechner, Scotts Co LLC
Lynn Snyder, Engineer, City of Orrville
David Handwerk, Mayor, City of Orrville
Steve Wheeler, Public Service and Safety Director, City of Orrville

ec: Mandy Razzano, Ohio EPA, DSW, NEDO
Clarisa Gereby, Ohio EPA, DMWM, NEDO

SCOTTS CO ORRVILLE
City of Orrville Wayne County

Photos Taken: April 25, 2012
By: Mandy Razanno, DSW, NEDO

Fig 1 & 2. Stains indicative of leaking fluids from trucks and other motor vehicles were observed on the pavement outside the Vehicle Maintenance Shop (ABOVE) and all along the Distribution Center loading docks (RIGHT).

Fig 3 (LEFT). Erosion was evident in the drainage swale that leads to Outfall 001 (Drainage Area 1). Erosion control matting or rip-rap may be necessary to stabilize this drainage channel.

Fig 4 (ABOVE). Dark soils were observed in and around the West Fertilizer Building.

Fig 5 (ABOVE LEFT). A grassy area near the creek has been torn up by equipment. This area must be restabilized.

Fig 6 (ABOVE RIGHT). The lid on the trash dumpster in the Finished Product Storage Area was open at the time of inspection even though it was not in use.

Fig 7 (LEFT). Trash and debris was observed along the south end of the Finished Product Storage Area and in the Wooded Area.

Fig 8 (RIGHT). Some portions of the Finished Product Storage Area do not drain to the storm water retention pond.

Fig 9 (LEFT). The 6-inch diameter lower orifice of the retention pond serving Drainage Area 6 appears too large to provide extended detention of the WQv.

Fig 10 (ABOVE). The former Composting Area has been graded and now must be stabilized with seed and mulch.

Fig 11 (LEFT). The sediment pond that serves Drainage Area 4 provides very little dewatering volume. The outlet structure does not draw water from the surface of the pond.

Fig 12 (RIGHT). Finished compost and peat humus are stored outdoors at the Growing Media Facility where they are prone to wind erosion. Runoff is directed to the sediment pond pictured in Fig 11 via surface flow and a subsurface drainage system (white pipe).

Fig 13 (LEFT). A roof has been built over the Fluffer to reduce windblown erosion of potting soils.

Fig 14 (RIGHT). Dust collectors (bag houses) have well-fitting solid lids, but it appears that there is still some spillage when collection bins are emptied. Employ good housekeeping practices to clean up spills promptly.

Fig 15. The fuel tank is kept within secondary containment and is covered with a roof.