



Environmental
Protection Agency

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

March 8, 2012

Dave Stewart
Worthington Cylinders
333 Maxtown Road
Westerville, Ohio 43082

**Re: Preliminary Storm Water Inspection at Worthington Cylinders
Permit Number 4GR00227*AG**

Dear Mr. Stewart:

This letter is written in follow up to a preliminary storm water inspection I conducted at Worthington Cylinders located on 333 Maxtown Road in Westerville, Ohio on February 16, 2012. This facility is currently covered under the General Storm Water Permit Associated with Industrial Activities. This preliminary inspection entailed the evaluation of materials and or processes exposed to storm water. Based on my preliminary inspection, the following items were noted:

Observations:

- The scrap steel bins located outside should be covered.
- All drums should be stored in areas of secondary containment. It appears secondary containment is provided.
- Please ensure a spill kit is provided for all loading and unloading areas.
- I noted a large roofed area on the western edge of the facility. I would recommend the use of this area for exposed materials such as waste bins, barrel storage, etc., to minimize the threat to storm water.

Storm Water Pollution Prevention Plan (SWPPP):

- A SWPPP must be developed specific for this site. The SWPPP must include a site map which clearly delineates all storm water drainage patterns. All storm water outfalls/discharges from the site must be indentified on the SWPPP. All Best Management Practices (BMP's), current and future must be inclusive in the SWPPP and site map. The SWPPP must be reviewed and updated on a yearly basis to reflect any changes at this facility. Guidance documents for preparing a SWPPP can be found at:

No Exposure Certification:

Ohio EPA has adopted the federal "No Exposure Certification" application form and is using the federal guidance document to determine whether facilities are eligible for the no exposure exemption. The "No Exposure Certification" exempts the facility from Storm Water Permitting requirements provided all processes and materials are stored under roof and you qualify in accordance with filing instructions (links) below. Facilities may apply for this exclusion. "No Exposure Certification" guidance, application form and instructions document is available at: http://cfpub.epa.gov/npdes/stormwater/exposure.cfm?program_id=6. Applicants should complete the form according to the instructions in the guidance and mail it to:

Ohio Environmental Protection Agency
Division of Surface Water
Attn: John Morrison
P.O. Box 1049
Columbus, OH 43216-1049

If you qualify for no exposure certification, you are exempt from permit requirements until your facility no longer qualifies for no exposure certification. If your facility changes and can no longer claim no exposure to storm water you must submit the appropriate permit application for storm water discharge.

The "No Exposure Certification" must be filled out and submitted every five years.

Additional information regarding "No Exposure Certification"
http://www.epa.state.oh.us/dsw/storm/ind_noexp_cert.aspx

The actual form you need to fill out is located at:
http://www.epa.gov/npdes/pubs/noexpoform_app4.pdf)

If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3844 or email at harry.kallipolitis@epa.state.oh.us.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office