



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 19, 2012

RE: LORAIN COUNTY
CITY OF ELYRIA
INDUSTRIAL STORM WATER
INVACARE CORPORATION –
CLEVELAND ST FACILITY
PERMIT No. 3GR00253*EG

Mr. Nick Steimle
Environmental Specialist
Invacare Corp.
1200 Taylor St
Elyria, OH 44036

Dear Mr. Steimle:

On June 4, 2012, Kelly McVay and this writer conducted an inspection of your facility, located at 899 Cleveland Street, Elyria, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) permit for Industrial Activity #OH000005 referenced above. You were also present as a representative of Invacare Corporation. Along with our observations from the inspection, comments concerning your permit are found below:

General

1. This site is the location of Invacare Corporation, Cleveland Street Facility, a company that manufactures home medical equipment described by Standard Industrial Classification (SIC) Code 3840: Medical Equipment and Supplies Manufacturing.
2. Storm water on site drains to a storm drain system on the south end of the property, which follows the railroad tracks, flowing northeast, emptying into the city's municipal separate storm sewer on Cleveland Street.

Inspection Observations

1. The trench drain in the shipping dock is clogged with sediment and debris (Figure 1). It appears to have been clogged for some time. Capping the drain is a possibility, therefore eliminating the chance for sediment and debris to get into the storm sewer system. If you think that you need to keep the drain, attaching a valve to the drain is a possibility. This approach would require good housekeeping on a much more frequent basis than if the drain was permanently capped. In addition, procedures would have to be adopted that require the valve be shut when shipping or receiving materials that can be spilled.
2. Scrap dumpsters, by the shipping docks, holding scrap motors, scrap metals and other miscellaneous waste are uncovered (Figure 2). These dumpsters should be covered with a tarp to prevent the collection of storm water and the formation of leachates.
3. A storage yard is located on the south side of the facility. If the facility does not plan on using any of the material in the yard, dispose of it as soon as possible for good housekeeping purposes.
4. The waste dumpsters by the receiving docks are covered by a roof over them. Oil stains are present by the garbage truck that picks up the trash (Figure 3). Clean the oil stains making sure those pollutants do not enter the storm drains. Notify your waste disposal

company of the situation and make sure they take care of the problem. Using good housekeeping practices, keep the area around the dumpsters clean, sweeping up the trash and debris around them.

Permit

1. The Storm Water Pollution Prevention Plan (SWPPP) must be updated to meet the requirements of the new Industrial General Storm Water NPDES permit #OH000005. To meet these new requirements, a new SWPPP must be implemented by July 1, 2012. Guidance on developing the SWPPP is available on the Ohio EPA website at:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

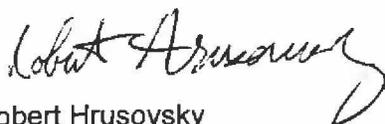
Action Items

- Make aforementioned improvements to the trench drain.
- Cover dumpsters with a lid or tarp.
- Notify waste disposal company of truck leaks and implement spill response procedures to address leaks that occur on your property.
- Clean trash and debris around dumpsters.
- Update SWPPP for latest permit requirements. Be aware that quarterly visual monitoring must commence no later than third quarter (July-September) 2012.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than July 3, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by e-mail at robert.hrusovsky@epa.state.oh.us. You can also contact Dan Bogoevski at (330) 963-1145 or by email at dan.bogoevski@epa.state.oh.us.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

cc: Chris Carter, Director of Operations, Invacare Corp
John Schneider, Assistant Engineer, City of Elyria

INSPECTION PHOTOS
Invacare Corporation, Cleveland Street
Lorain County



Figure 1
Trench drain filled with sediment and debris.



Figure 2
Dumpsters uncovered.



Figure 3
Oil stains from waste disposal truck.