



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 14, 2012

RE: LAKE COUNTY
CITY OF MENTOR
INDUSTRIAL STORM WATER
AEXCEL CORPORATION

Ms. Lorrie Webb
Aexcel Corp.
7373 Production Drive
Mentor, OH 44060

Dear Ms. Webb:

On May 23, 2012, Dan Bogoevski of the Ohio EPA, Division of Surface Water, conducted an inspection of your facility located at 7373 Production Drive to determine compliance with Ohio EPA, General Storm Water National Pollutant Discharge Elimination System (NPDES) permit for storm water associated with industrial activity #OHR000005. In addition, from the Ohio EPA, Division of Surface Water, Katie Bowman, Kelly McVay and myself, Robert Hrusovsky, were present during this inspection. You represented Aexcel Corporation during the inspection. Along with our observations from the inspection, we have provided comments concerning your permit below:

General

1. This facility is the location of Aexcel Corporation, a company that manufactures and sells traffic paint described by SIC code 2851: Paints, Varnishes, Lacquers, Enamels and Allied Products.
2. Storm water from this facility discharges into the municipal separate storm sewer system (MS4) of the City of Mentor. The storm water drainage system on the south side of the facility is equipped with a valve to shut off discharges to the MS4 if necessary.

Inspection Observations

1. An inside floor drain next to the southwest receiving docks is not permanently capped (Figure 1). There is hazardous waste being stored near, but not immediately near the drain. The drain must be capped.
2. A spill kit is not available at the northeast loading docks. It is recommended that a spill kit be available in case any spill should occur.
3. There is staining under the trash compactor and the lid was left open (Figure 2). Be more careful when adding trash to the compactor making sure there is minimal spillage. The lid must be kept closed at all times, except when adding or removing trash occurs. Implement good housekeeping practices to clean up trash that spills outside the compactor.
4. Rag drums are being stored outside the northeast door of the facility and were lidded (Figure 3). These drums should be added to the facility's list of pollutants in your Storm Water Pollution Prevention Plan (SWPPP).

5. The scrap metal dumpster is uncovered (Figure 4). The dumpster must have a lid or tarp over it at all times except when adding or removing scrap occurs.
6. Near the scrap metal dumpster is the paint test area. When used, the paint machine is washed out at the north docking area. The paint machine is placed in a containment pool when washed and the water is pumped out and put into drums. Paint machine washing should be added to the SWPPP as a potential pollutant source and the procedures to prevent storm water pollution associated with this activity should be added to your SWPPP.
7. There is a water hose at the baghouse (Figure 5). Your SWPPP states that the dust from the baghouse is swept up. Do not use the hose to spray off the dust. That dust is a pollutant and should be swept up and put into the waste dumpster. You indicated that this is indeed your procedure.
8. The resin and latex receiving dock, on the southeast corner of the building, has a drip pan under it (Figure 6). This is good, but the drip pan has not been cleaned out in a while. If it rains, the pollutants can splash or overflow onto the ground. There is staining on the ground around the dock, which indicates that there was leaking or overflow from the drip pan or during the chemical receiving process. The drip pan must be cleaned out immediately after any resin or latex has been loaded into the dock. It should be routinely checked for any leakage and cleaned up immediately. Spill prevention and response measures must be implemented to prevent resins and latex from spilling onto the ground during unloading.
9. The secondary containment around the bulk chemical tanks is in good condition. If need be, storm water that accumulates within secondary containment is pumped out of the containment area and stored in the evaporating pool.
10. The facility indicates that valves in the storm water drainage system are all kept closed even during normal operations (Figure 7). But, in a heavy rain event, the entire area around the receiving docks, on the south side of the facility, floods and becomes like a swimming pool. When this occurs, the accumulated runoff is discharged, either by opening the valves or being pumped out. Ohio EPA cautions Aexcel Corporation that any pollutants that have spilled onto the pavement have been accumulating since the last time the runoff was discharged. The raw material storage area, the resin and latex docks, and the evaporating pool are contributing pollutants to the storm water that accumulates and is subsequently discharged. Processes and procedures to evaluate this storm water before it is discharged must be added to your SWPPP. This dewatering activity must be identified in the SWPPP as a potential pollutant source.

Permit

1. The SWPPP must be signed by John Milgram as required by section 5.1.7 in the NPDES permit.
2. The non-storm water certification must be signed.
3. All updated portions to the plan should be added to the SWPPP binder and all old portions should be removed and stored separately for clarity.
4. For employee training, records of scheduled training dates, topics covered, and attendance should be added as an appendix to the SWPPP as required by section 5.1.5.1 in the permit.
5. As you are aware, the general industrial storm water permit was renewed by Ohio EPA on January 1, 2012. The new permit contains significant changes that will require you to update the SWPPP. Updates to the SWPPP to comply with the new permit are to be made by July 1, 2012.

Action Items

- Cap southwest floor drain inside facility.
- Place a spill kit in northeast loading dock area, inside facility.
- Keep waste compactor lid closed and implement a good housekeeping program.
- Add rag drums to pollutant list in SWPPP and update site map to show the location of this pollutant source.
- Cover the scrap metal dumpster with a tarp.
- Add the washing of the paint machine to pollutant list in SWPPP.
- Keep resin and latex drip pan clean. Implement spill response procedures to prevent spills during chemical receiving processes.
- Identify dewatering activities from the south side of the facility as a potential pollutant source. Develop and implement evaluation procedures for this storm water before it is dewatered to the City of Mentor MS4.

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 June 29, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by email robert.hrusovsky@epa.ohio.gov.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

cc: David Swiger, Engineer, City of Mentor
Lorne Vernon, Director of Public Works, City of Mentor

Attachments: Photos



Figure 1 Floor drain next to southwest door to facility.



Figure 2 Trash Compactor, Lid Open



Figure 3 Rag Drums



Figure 4 Scrap Metal Dumpster, Uncovered



Figure 5 Baghouse, Hose in Area



Figure 6 Resin & Latex Dock, Drip Pan Needs Cleaned



Figure 7 Valve Closed in Catch Basin