



**Environmental
Protection Agency**

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

June 27, 2012

RE: KIMBLE TRANSFER
STORMWATER
SUMMIT COUNTY
TWINSBURG TOWNSHIP
3GC00724*AG

Don Johnson
General Manager
Kimble
8500 Chamberlin Road
Twinsburg, Ohio 44087

Dear Mr. Johnson:

On June 26, 2012, this writer conducted an inspection of your facility, located at 8500 Chamberlin Road, Twinsburg Township, Summit County to determine compliance with State and Federal Stormwater Regulations. Mr. John Lehlbach, Kimble, accompanied me during the inspection. Below you will find a summary of the inspection:

General

Penn-Ohio Coal Company, d.b.a. Kimble Transfer & Recycling operates a solid waste transfer station, recycle and vehicle maintenance facility on approximately 12.5 acres. While the mailing address is Twinsburg, the physical location is in Twinsburg Township. All sanitary waste is transferred to landfills owned by the company. Recycle material consists of plastics, glass, ferrous and non-ferrous metals, and paper. Transfer and recycling activities are done under roof. Floor drains are present in each building where these operations occur including the vehicle maintenance and washing building. The floor drains are all connected to oil/water separators, which in turn are connected to the Summit County sanitary sewers.

Construction Storm Water

- 1) Kimble does possess an effective storm water construction general permit issued on March 31, 2004, 3GC00724*AG. The original Notice of Intent (NOI) filed for permit coverage was for the entire acreage.
- 2) Upon review of the Storm Water Pollution Prevention Plan (SWPPP) it appears that the activities and planned building construction have changed from the original plan submitted to this office in March 2004. Composting and wood recycling has never been practiced. Buildings, such as the recycling building, have been built that are not shown on the original plan.
- 3) Storm Water Permit 3GC00724*AG should have been terminated after the initial construction had been completed. If the recycle building was not part of the original SWPPP, then a new construction general permit along with an updated SWPPP should have been filed with this agency to cover the recycle building construction. The sedimentation pond should have been designed and constructed to account for the new construction.
- 4) The current storm water retention basin outlet structure was not fitted with sediment controls. It should have been designed to provide sediment storage and dewatering volume to release the required storm water event over a 24-hour period. The storm

water event and design requirements are defined in the construction general permit, the overall basin design can be found in the Rainwater and Land Development Guide, Ohio's Standards for Stormwater Management Land Development and Urban Stream Protection.

Industrial Storm Water

- 1) It has been determined that solid waste transfer facilities are not defined as an "Industrial" activity subject to obtaining an Industrial General Stormwater Permit as long as the waste being transferred is disposed at company owned landfills. Mr. Lehlbach stated that all solid waste is being transferred to Kimble landfills. However, recycling and vehicle maintenance operations performed at your site are subject to obtaining the permit.
- 2) We acknowledge that you have submitted a No Exposure Certification For Exclusion From National Pollutant Discharge Elimination System (NPDES) Stormwater Permitting form to this agency on January 20, 2010. Based upon my inspection observations, you do not qualify for this exemption. Dumpsters containing recycle materials were uncovered, screened dirt is being stored directly adjacent to a storm catch basin, and recycled plastic and glass is exposed to storm water on the north side of the building. Pictures are attached for your reference.
- 3) You must develop a SWPPP plan for the industrial activities at your site and obtain coverage by filing a NOI for coverage with this agency.

Action Items

- 1) As per the construction general permit, you were required to update the SWPPP plan for the new construction and for making any changes to the existing sedimentation pond. This should have been done before the construction took place last August. Please submit the plan to the Summit Soil and Water Conservation District for their review and approval no later than July 20, 2012.
- 2) As identified above, your facility is regulated under the new Multi Sector General Permit for Industrial Storm Water. The SWPPP plan must be prepared no later than August 1, 2012. Once the plan is prepared a NOI for coverage under MSGP must be submitted to this agency no later than August 1, 2012.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136 or by e-mail phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/cs

File: Industrial Stormwater

cc: Dave Dysle, Ohio EPA, DMWM, NEDO

Cindy Fink, Summit Soil & Water Conservation District



