



**Environmental  
Protection Agency**

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

June 28, 2012

RE: WAYNE COUNTY  
WOOSTER TWP  
INDUSTRIAL STORM WATER  
ADVANCED DRAINAGE SYSTEMS

Mr. Barry L. Girvin  
Plant Manager  
Advanced Drainage Systems, Inc.  
3113 West Old Lincoln Way  
Wooster, OH 44691

Dear Mr. Girvin:

On June 12, 2012, this writer conducted an inspection of your facility, located at 3113 West Old Lincoln Way, Wooster, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity #OH000005. Along with my observations from the inspection, I have provided comments concerning your permit below:

General

1. This site is the location of Advanced Drainage Systems Incorporated, a company that manufactures plastic drainage pipes and fittings described by SIC code 3084: Miscellaneous Plastic Products.
2. All the storm drains on the property flow into a detention pond on the northeast corner of the storage yard, which drains into another detention pond to the east. When that detention pond overflows, it flows into a natural swale flowing north to another detention basin in the northeast corner of the property. When that detention pond over flows, the water flows northeast, exiting the property, towards a wooded area and into an unknown tributary of Little Killbuck Creek.

Inspection Observations

1. All of the drains inside the building are connected to the facility's storm sewer system (Figure 1). Ohio EPA recommends these drains be capped to prevent the plastic granulates and other pollutants from entering the storm drains. These pollutants must be added to your list of potential pollutant sources in your Storm Water Pollution Prevention Plan (SWPPP) until the drains are capped. Keep the floor clean by regularly sweeping up the plastic granulates on the floor so no granulates enter the storm drains.
2. The oil drums (Figure 2), stored inside the building, must be held in secondary containment as a precaution, should a spill occur. Spill prevention and response procedures must be implemented to prevent oil from spilling onto the floor and entering the storm drains nearby. Keep a spill kit in that area in case a spill should occur.
3. A trailer is sitting in a loading dock along the south side of the office building. Leaves and other debris have accumulated around a storm drain in the dock (Figure 3). Sweep up the debris, dispose of it in the waste dumpster and regularly inspect the area for debris by implementing good housekeeping practices.
4. The raw material station, where the plastic pellets are unloaded, is on the southeast side of the building. Drip pans are used to catch the pellets when attaching hoses to the tanks

- (Figure 4). Some pellets have spilled onto the gravel. Implement good housekeeping practices so to clean up any spills in the area.
5. The waste compactor, located on the west side of the building, is uncovered (Figure 5). The compactor must be covered by a lid or tarp to prevent the collection of storm water and the formation of leachates. The dumpster must also be added to your list of potential pollutant sources in your SWPPP
  6. A used oil container, which is unlabeled, is stored outside along the west side of the building (Figure 6). Used oil from inside the facility is emptied into this container. This container must be held in secondary containment and must be labeled "Used Oil". Spill prevention and response procedures must be implemented to prevent oil from spilling onto the ground. Keep a spill kit in that area if a spill should occur. The container must be added to your list of potential pollutant sources in your SWPPP.
  7. The recyclable holding dumpster does have a lid, but the lid is damaged so the inside of the dumpster is exposed to storm water (Figure 7). Contact your recycling company and replace the dumpster with a lid that will keep the dumpster unexposed.
  8. There is evidence of oil leaks from trucks parked in the parking area along the north side of the building. Routinely inspect the trucks for any leaks. If a leak is discovered, place a drip pan underneath it. Clean up any oil stains on the ground and dispose of the waste in your waste dumpster.
  9. A diesel fuel tank is located west of the truck parking area. The tank is held around a secondary containment dike and is kept under a roof. A spill kit must be present in the area, and must be clearly labeled, so to clean up any spills, should any occur. The emergency stop button is located about 10 to 20 yards to the east of the fuel station, in the truck parking lot (Figure 8). A sign clearly identifying the emergency stop button must be installed so to quickly shut off the system if necessary. The fuel tank must also be added to your list of potential pollutant sources in your SWPPP.
  10. A snow plow bucket is stored outside around the northwest end of the storage yard (Figure 9). The hydraulic connectors are not capped and there is evidence that they have leaked onto the gravel. Cap the connectors, preventing any leaks to occur, and clean the spilled oil stain and dispose of that waste properly by disposing it into the waste dumpster.
  11. The detention pond located by the northeast corner of the storage yard is full of sediment from storm water runoff, close to blocking the outlet pipe of the pond (Figure 10). The pond must be dredged out to restore storage for settled sediments. The source of sediment must also be added to your list of potential pollutant sources in your SWPPP.
  12. It was noted that this facility washes their trucks outside. An outside company is contracted to wash their trucks. The NPDES permit for industrial storm water does not authorize the discharge of vehicle wash water. Measures must be taken to prevent this wastewater discharge to the storm water drainage system, or you must seek a separate NPDES permit to authorize such discharges. All vehicle wash water should be directed to sanitary sewers, if available at your facility. If sanitary sewers are not available, either cease vehicle washing activities on-site or use a wash pad or other such method that can collect the wastewater for subsequent proper disposal off-site.

#### Permit

1. A general location map of your facility must be provided in your SWPPP as required in Part 5.1.2 in the permit. The map must provide enough detail to identify the location of your facility and all receiving waters for your storm water discharges.

2. The site map provided in Appendix B of your SWPPP is not compliant to the site map requirements in Part 5.1.2 of the permit. The provided site map is a layout of the building only. The required site map is a map of the entire property, showing the directions of storm water flow, the locations of your storm water inlets and outfalls, and other requirements found in Part 5.1.2 of the permit.

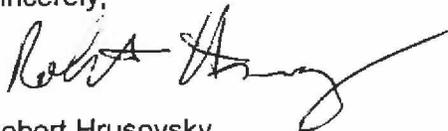
Action Items

- Cap all floor drains inside building.
- Provide secondary containment to oil drums.
- Cover waste compactor with a lid or tarp.
- Provide secondary containment for the used oil container.
- Replace recycle dumpster with one with better lid.
- Install a sign to clearly identify the emergency stop button for the diesel fuel tank.
- Cap hydraulic connectors of snow plow bucket.
- Dredge out detention pond.
- Stop washing vehicles outside.
- Implement good housekeeping practices in and around the facility.
- Add aforementioned areas to list of potential pollutant sources in your SWPPP.
- Create a general location map and make improvements to the site map in your SWPPP.

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 12, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by e-mail [robert.hrusovsky@epa.state.oh.us](mailto:robert.hrusovsky@epa.state.oh.us). You can also contact Dan Bogoevski Bogoevski, District Engineer, Division of Surface Water at (330) 963-1145 or by e-mail at [dan.bogoevski@epa.state.oh.us](mailto:dan.bogoevski@epa.state.oh.us).

Sincerely,



Robert Hrusovsky  
Assistant to the District Engineer  
Division of Surface Water

RH/cs

cc: Edwin Tinoco, P.E. CHEM-TECH Consultants, Inc.  
Wooster Twp. Trustees

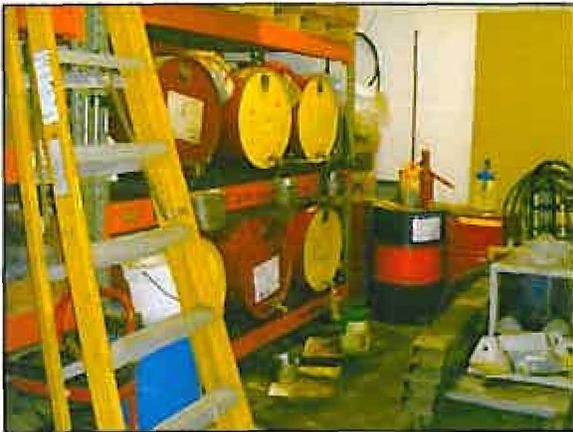
INSPECTION PHOTOS  
June 12, 2012  
Wayne County



**Figure 1**  
Inside drain connected to storm sewer.



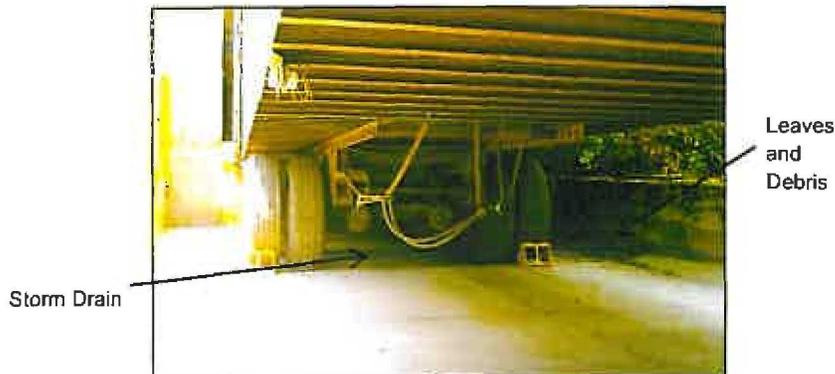
**Figure 4**  
Plastic pellet unloading station.



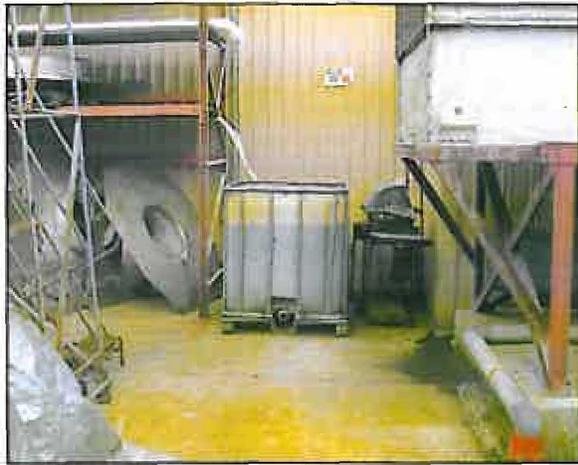
**Figure 2**  
Oil drums inside building.



**Figure 5**  
Waste compactor uncovered.



**Figure 3**  
Leaves and debris collected by storm drain.



**Figure 6**  
Used oil container needs secondary containment.



**Figure 9**  
Cap hydraulic connector hoses.



**Figure 7**  
Recycle dumpster needs new lid.



**Figure 10**  
Dredge out detention pond.



**Figure 8**  
Emergency stop button needs to be clearly identified.