



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 28, 2012

RE: GEAUGA COUNTY
AUBURN TWP
INDUSTRIAL STORM WATER
JOHNSONITE

Mr. Charles E. Sahyers
Manager Facility Maintenance
Johnsonite
16910 Munn Road
Chagrin Falls, OH 44023

Dear Mr. Sahyers:

On June 18, 2012, this writer conducted an inspection of your facility, located at 16910 Munn Road, Auburn Township, Ohio. It was brought to my attention that the facility submitted a No Exposure (NOE) certification on November 18, 2011. As a representative of Johnsonite, you were present during the inspection. During my inspection, I assessed the applicability of the National Pollutant Discharge Elimination System (NPDES) storm water permit program for industrial activity. Along with observations from the inspection, I have provided comments concerning NPDES permit program below:

General

1. This site is the location of Johnsonite, a manufacturer of vinyl wall base materials for residential and commercial uses as described by Standard Industrial Classification (SIC) Code 3089: Miscellaneous Plastic Products.
2. All storm drains on site flow into a retention pond on the property. The pond discharges through a non-clogging outlet pipe, and into a ditch to the south of the property which flows west into the woods. Due to the design of the outlet, the pond has some capacity to trap floatables such as oil and grease. If any oil is discovered in the pond, the oil is cleaned out immediately.

Inspection Observations

1. Limestone dust or PVC powder has accumulated on the ground around the silos outside (Figure 1). Implement good housekeeping practices to make sure the dust and powder is always swept up and disposed of into the waste dumpster.
2. Some oil staining from trucks is present near the loading and unloading docks (Figure 2). Keep the area clean by implementing good housekeeping practices and place drip pans under leaking trucks when leaking is discovered.
3. The waste compactor is connected to the inside of the building, covered and not exposed to storm water.
4. The retention pond's outfall into the ditch to the south was examined. There appears to be no oil sheen or anything in the water, and there is no smell.

Permit

1. After assessing your facility, this site does not qualify under No Exposure. Pollutants are being exposed to storm water and storm water that contacts areas of industrial activity does discharge from your facility. Dust and powder from the silo loading area and oil

leaks from trucks can get into the pond and discharge into the ditch to the south of the property. You must renew coverage under the Ohio EPA general NPDES permit #3GR00750*DG. To renew your industrial storm water general permit coverage, you must fill out and submit a one page Industrial Storm Water Notice of Intent (NOI) application form and permit fee (\$350) to the following address:

Ohio EPA
ATTN: Office of Fiscal Administration
P.O. Box 1049
Columbus, OH 43216-1049

The form can be found on the Ohio EPA website at the following address:

http://epa.ohio.gov/portals/35/storm/Industrial_NOI_Form.pdf

Update your Storm Water Pollution Prevention Plan (SWPPP) so that it meets the new requirements of the current NPDES permit. Please be aware that Part 8 of the NPDES permit applies to sector-specific requirements associated with your primary industrial activity. According to your SIC Code 3089, your facility corresponds to sector and subsector Y2 in the NPDES permit.

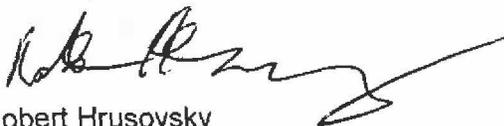
Action Items

- Renew NPDES permit coverage and update your SWPPP. The plan should be updated no later than July 31, 2012.
- Sweep up limestone dust and PVC powder.
- Clean up oil stains on concrete and implement practices to prevent leaks onto pavement.
- Implement good housekeeping practices around the facility and keeping the area clean.

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 these materials no later than July 13, 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. You can also contact Dan Bogoevski, District Engineer, Division of Surface Water at (330) 963-1145 or by e-mail at dan.bogoevski@epa.state.oh.us.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

cc: Trustees, Auburn Twp.