



**Environmental
Protection Agency**

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

June 28, 2012

RE: GEAUGA COUNTY
VILLAGE OF MIDDLEFIELD
INDUSTRIAL STORM WATER
MIDDLEFIELD WAREHOUSE

Mr. Richard Patterson
Third Dimensions, Inc.
633 Pleasant Avenue
P.O. Box 309
Geneva, OH 44041

NOTICE OF VIOLATION

Dear Mr. Patterson:

On June 18, 2012, this writer conducted an inspection of your facility, located at 15332 Old State Road, Middlefield, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit Associated with Industrial Activity #OH000005. As a representative of Middlefield Warehouse, Terry Geraci, the warehouse manager, was present during the inspection.

General Storm Water NPDES Permit

The facility did not renew their coverage under the Ohio EPA General NPDES Permit #3GR01360*DG. It is required that the facility renew their industrial storm water permit. To receive industrial storm water general permit coverage, you must 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

The industrial storm water general permit requires a facility to implement Best Management Practices (BMPs) and develop a Storm Water Pollution Prevention Plan (SWPPP) to minimize or eliminate the potential for storm water contamination. A copy of the permit, along with guidance material, can be found on the Ohio EPA website at the following address:

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

The listing of the old permit was under Carlisle Corp. rather than Third Dimension Inc. It was noted that Third Dimension Inc. did purchase the facility from Carlisle Corp. Failure to provide written notification to Ohio EPA at least 30 days prior to the proposed transfer is a violation of Ohio Administrative Code (OAC) 3745-38-02(K).

The NOI to renew permit coverage was to be submitted to Ohio EPA no later than March 31, 2012. Failure to maintain NPDES permit for storm water discharges associated with industrial activity is a violation of Ohio Revised Code (ORC) 6111.04 and 6111.07. Violations of ORC

6111 are punishable by fines of up to \$10,000 per day of violation. Third Dimensions Inc. will remain in violation until NPDES permit coverage is renewed.

I offer the following comments regarding compliance with NPDES storm water regulations:

General

1. This site is the location of Middlefield Warehouse, a warehouse that stores cardboard boxes.
2. It is unknown where the storm water onsite drains to.

Inspection Observations

1. There is oil staining outside the garage door in the south alleyway of the building. Implement good housekeeping practices, making sure any oil spills are cleaned up properly and disposed of into a waste dumpster. If a vehicle is discovered to be leaking oil, place a drip pan beneath the leak to catch the oil.
2. There are three large bags full of wood chips sitting in the alleyway. The bags are uncovered. Cover the bags with a tarp or store the bags inside the building so to prevent the collection of storm water and the formation of leachates.
3. There are some piles of excavated concrete on the south side of the property. I noted during my inspection that I was not sure if the piles should be covered or not. I have spoken to my supervisor about this situation and the piles can be left uncovered as long as the concrete is dry and hardened.
4. The facility stores cinders, on the northwest corner of the building, under a roof. The cinders are used to de-ice the gravel parking lots in winter. We ask that you specify exactly what kind of the material you are using as cinders, from what company you are purchasing these cinders, and any test data that has been recorded on the cinders.

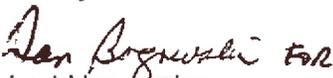
Action Items

- Clean up oil stains.
- Provide cover to wood chip bags.

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. Also, please submit a copy of the NOI, a copy of your completed SWPPP and the cinder documentation asked for above. Please provide me with a letter of response no later than July 23, 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: Terry Geraci, Warehouse Manager, Middlefield Warehouse (15332 Old State Road, Middlefield, OH 44062)