



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 17, 2012

RE: CUYAHOGA COUNTY
CLEVELAND
INDUSTRIAL STORM WATER
WEST 3RD AGGREGATE FACILITY
PERMIT NO: 3GR01468

Mr. Ray Wiecek
Risk Management Director
Independence Recycling Inc.
5720 Schaaf Road
Independence, OH 44131

Dear Mr. Wiecek:

On July 10, 2012, this writer conducted an inspection of your facility, located at 2615 West 3rd Street, Cleveland, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) permit for Industrial Activity. As a representative of West 3rd Aggregate Facility, Eric Sherrill, the plant manager, was present during the inspection. Along with my observations from the inspection, I have provided comments concerning your permit below:

General

1. This site is the location of West 3rd Aggregate Facility, a facility that stores and processes slag as described by their Standard Industrial Classification (SIC) Code 3295: Abrasive, Asbestos, and Miscellaneous Nonmetallic Mineral Products.
2. Sheet flow from the property flows into the Cuyahoga River, along the entire east side of the property.
3. Three catch basins along the northwest side of the property flow north and into the city of Cleveland's municipal separate storm sewer.

Inspection Observations

1. The rock salt stockpile, on the southeast of the property, is covered. There is evidence that salt is still seeping out and flowing east through a hole in the adjacent concrete wall and towards the river (Figure 1). Provide a berm, around the opening in the concrete wall, east of the wall. A berm will allow the water to pond and the sediment and other pollutants can settle. The salt will be contained inside the berm. Implement routine inspections of the berm and periodically clean out the pollutants inside the berm and properly dispose of the waste.
2. The waste dumpster was left uncovered. The dumpster must be covered to prevent the collection of storm water and the formation of leachates.
3. A small salt pile on the northeast corner of the property is uncovered (Figure 2). The salt pile must be covered to prevent exposure to storm water.
4. The metal scrap dumpster was uncovered (Figure 3). There was a few old oil drums inside that may still have oil in them. The dumpster must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.
5. In the area around the scrap dumpster, various material is being stored outside (Figure 4). For good housekeeping purposes, if the facility does not plan on using any of this material, properly dispose of the material as soon as possible.

6. There is a lot of loose dust and sediment throughout the facility. When it rains, the sheet flow will pick up loose sediment and flow into the river. Install a silt fence along the river so to protect the river from sediment pollution.
7. The facility sprays a milky white liquid for dust control (Figure 5). We ask that you specify exactly what kind of material you are spraying for dust control, from what company you are purchasing this material, and any test data that has been recorded on this material.

Permit

1. As required in Part 5.3 of the NPDES permit, a copy of the current Storm Water Pollution Prevention Plan (SWPPP) shall be retained at the facility and it shall be immediately available to Ohio EPA. Please keep a copy of your current SWPPP at this facility.
2. A schedule for all types of necessary employee training must be provided in the SWPPP as required in Part 5.1.5.1 in the NPDES permit.
3. Please be aware that according to your SIC code, your specific sector in this permit is Sector E. Specific sector requirements for your type of industrial activity can be found in Part 8 Subpart E of the NPDES permit. According to your subsector, Subsector E3, your facility is not subject to benchmark monitoring, but is subject to effluent limitations found in Table 8.E-2 in Part 8.E.5 of the NPDES permit.
4. In addition, please be aware that all inspection reports, including Routine Facility Inspection Reports, the Quarterly Visual Assessment Reports, and the Comprehensive Inspection Reports are to be kept with your SWPPP.

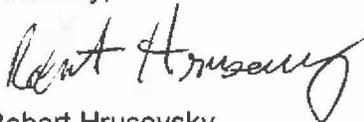
Action Items

- Berm the aforementioned area so to contain salt seepage.
- Cover dumpsters with lids or tarps.
- Cover small salt pile on northeast corner of property.
- Install silt fence along the Cuyahoga River for sediment control.
- Make aforementioned improvements to 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 no later than July 30, 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.

Sincerely,



Robert Hrusovsky
Assistant to the District Engineer
Division of Surface Water

RH/cs

cc: Rachid Zoghaib, Commissioner, Division of Water Pollution Control, City of Cleveland

INSPECTION PHOTOS
July 10, 2012
Cuyahoga County



Figure 1
Salt tracking out of opening in concrete wall.



Figure 2
Uncovered Salt Pile



Figure 3
Uncovered Scrap Dumpster

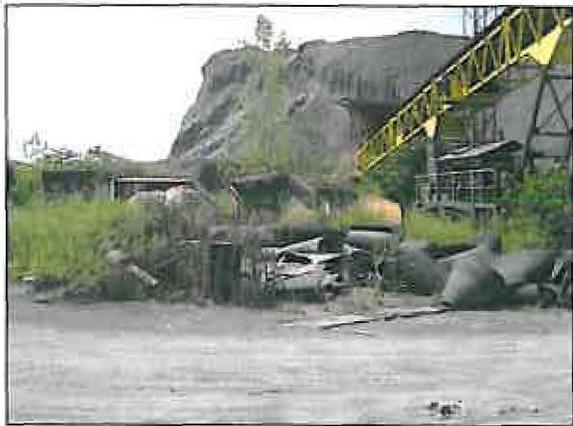


Figure 4
Material being stored outside



Figure 5 Liquid material for dust control.