



Environmental
Protection Agency

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

August 6, 2012

Mr. Sabir Waahid
Maintenance Manager
Dole Fresh Vegetables, Inc.
600 Benjamin Drive
Springfield, OH 45502

RE: Industrial Storm Water Site Inspection, NPDES Permit # 1GR01131*EG

Dear Mr. Waahid:

On Wednesday, August 1, 2012, I inspected Dole Fresh Vegetable Inc.'s Springfield facility to determine compliance with its industrial storm water discharge permit. Jim Pellegrino from Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) accompanied me on this inspection. You and Bill Vith represented the facility during our review.

Based on my observations of the site's operations and a review of relevant documents, it appears the facility is in substantial compliance with the terms of its general industrial storm water discharge permit.

Contrary to what I stated during the inspection, the presence of trench drains on their own is not enough to require the company to have industrial stormwater permit coverage. With the lack of other "significant materials" being stored outdoors, the site could potentially certify that it meets the requirements for a "no exposure" option, which reduces many of the requirements imposed by the industrial stormwater permit.

If Dole's Springfield facility decides to pursue the no exposure option, it can self-certify by answering "no" to each of the 11 questions in the "exposure checklist" at the top of page 2 of the No Exposure Certification form, which is available at the following web link:

http://www.epa.ohio.gov/portals/35/storm/no_exposure_certification_fis.pdf

The completed checklist is to be signed and sent in to Ohio EPA's central office in Columbus. This certification must be renewed every 5 years, assuming the company's activities have not changed such that "significant" materials are managed outdoors and exposed to rainstorms.

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If you have any questions related to this inspection, I can be contacted at 937.285.6442,
or via email at chris.cotton@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cotton". The signature is fluid and cursive, with the first name "Chris" and last name "Cotton" clearly distinguishable.

Chris Cotton
Environmental Specialist II
Division of Surface Water

CC/ff

cc: OEPA/SWDO/DSW Files