



**Environmental
Protection Agency**

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

August 6, 2012

RE: LAKE COUNTY
MADISON VILLAGE
INDUSTRIAL STORM WATER
CHEMMASTERS
PERMIT NO: 3GR00271

NOTICE OF VIOLATION

Ms. Brenda Carr
Plant Manager
ChemMasters
300 Edwards Street
Madison, OH 44057

Dear Ms. Carr:

On July 24, 2012, this writer conducted an inspection of your facility, located at 300 Edwards Street, Madison, Ohio. This inspection was performed to follow-up on an inspection conducted last year by Kelly McVay on June 13, 2011. The purpose for these inspections are to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity. As a representative of ChemMasters, Laura Caswell was present during the inspection. Along with my observations, I have provided comments concerning your permit below:

Permit Violations

1. **Failure to evaluate for the presence of non-storm water discharges.** This is a violation of Part 5.1.3.4 of the NPDES permit and Ohio Revised Code (ORC) 6111.04 and 6111.07. It must be documented in your Storm Water Pollution Prevention Plan (SWPPP) that you have evaluated for the presence of non-storm water discharges and that all unauthorized discharges have been eliminated.
2. **Failure to certify your SWPPP.** This a violation of Part 5.1.7 of the NPDES permit and ORC 6111.04 and 6111.07. The SWPPP must be signed and dated, including the date of signature, and also include the following certification statement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

3. **Failure to provide erosion and sediment controls.** This is a violation of Part 2.1.2.5 of the NPDES permit and ORC 6111.04 and 6111.07. From the 2011 inspection, ChemMasters was directed to provide preventative measures, for erosion and sediment

control, for the drains in each of the east loading docks. The facility did provide a curb of cinderblocks around the old shipping dock, but sediment is still making its way to the drain (Figure 1). There is also sediment inside the south shipping dock (Figure 2). The north loading dock is free of sediment and debris. Sediment and erosion control measures must be applied as soon as possible. Geotextile filters were suggested during the 2011 inspection. I recommend that geotextile filters be installed in the old shipping dock and new shipping dock drains. The area around the docks is unpaved, containing dirt and gravel. The area can be stabilized either by planting vegetation on the loose soil or by placing fresh gravel over the disturbed areas.

General Observations

1. The waste dumpster near the north loading dock was uncovered. The lid on the dumpster must be kept covered to prevent the collection of storm water and the formation of leachates.

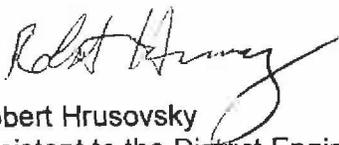
Action Items

- Evaluate for the presence of non-storm water discharges. Provide documentation in your SWPPP.
- Sign and certify your SWPPP.
- Provide erosion and sediment controls for the old shipping dock and new (south) shipping dock drains.
- Keep waste dumpster covered.

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 August 20, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by e-mail at robert.hrusovsky@epa.state.oh.us. If you have further questions after August 17, 2012, please contact Dan Bogoevski, District Engineer of the 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: Laura Caswell, Vice President, Operations and Finance, ChemMasters
Alyson Moritz, Village Administrator, Madison Village

INSPECTION PHOTOS
July 24, 2012
Lake County



Figure 1
Sediment tracking into old shipping dock storm drain.



Figure 2
Sediment tracking into new (south) shipping dock storm drain.