



**Environmental
Protection Agency**

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

August 9, 2012

RE: CUYAHOGA COUNTY
MAPLE HEIGHTS
INDUSTRIAL STORM WATER
CLIFTON STEEL
PERMIT NO: 3GR01205

Mr. Bill Bernay
Plant Manager
Clifton Steel
16500 Rockside Road
Maple Heights, OH 44137

Dear Mr. Bernay:

On August 1, 2012, this writer conducted an inspection of your facility, located at 16500 Rockside Road, Maple Heights, Ohio. This inspection is a follow-up to last year's inspection conducted by Kelly McVay on June 20, 2011. These inspections are conducted to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity. As a representative of Clifton Steel, Fred Heppner and yourself were 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 Clifton Steel, a facility that specializes in the fabrication of various metal, steel and aluminum parts as described by Standard Industrial Classification (SIC) Code 3443: Fabricated Metal Products, Except Machinery and Transportation Equipment, and Coating, Engraving, and Allied Services.
2. The drains inside the building flow east, through underground piping, then north into the City of Maple Heights' Municipal Separate Storm Sewer System along Rockside Road.
3. Storm water from the parking lot areas and areas on the south side of the building flow into a swale along the south property line. From the swale, the water flows east to the other side of the railroad tracks.

Inspection Observations

1. Trench drains are lined from north to south inside the facility between the north and south doors. The facility indicated that they will be installing a shut off valve to protect the storm water system. Dumpsters containing various metals are stored inside along the trench drains. Routinely inspect the dumpsters, checking for any leaks or debris around the dumpsters. Implement good housekeeping practices, making sure everything is kept clean and oils are properly cleaned and disposed of.

Permit

1. Clifton Steel has failed to conduct employee training concerning storm water. Employee training must be conducted at least annually. You must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the NPDES permit as required in Part 2.1.2.9 of the NPDES permit. All records of employee training,

including the date of training received, are to be kept with the Storm Water Pollution Prevention Plan (SWPPP).

2. Routine facility inspections must be conducted at least quarterly as required in Part 4.1 of the NPDES permit. The inspections must cover all areas of the facility where industrial materials or activities are exposed to storm water. All inspection reports must be kept with your SWPPP.
3. As required in Part 5.3 of the NPDES permit, you shall retain a copy of the current SWPPP at the facility and it shall be immediately available on site.

Action Items

- Install trench drain shut off valve as soon as possible.
- Make aforementioned improvements to your SWPPP.
- Keep a copy of your SWPPP at the facility.

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 23, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by email 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: Fred Heppner, Quality Control Manager, Clifton Steel
Edward Hren, P.E., City Engineer, City of Maple Heights