



**Environmental
Protection Agency**

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

August 14, 2012

RE: CUYAHOGA COUNTY
SOLON
INDUSTRIAL STORM WATER
ERICO INC - 34600 SOLON RD
PERMIT NO: 3GR01035

Ms. Amy Lucia
Environmental, Health & Safety Manager
Erico, Inc.
34600 Solon Road
Solon, OH 44139

Dear Ms. Lucia:

On August 13, 2012, this writer conducted an inspection of your facility, located at 34600 Solon Road, Solon, Ohio to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity. As representatives of Erico Incorporated, Chester Bertel, Bill Deak and yourself were present during the inspection as well. Along with my observations from the inspection, I have provided comments concerning your permit below:

General

1. This site is the location of Erico Incorporated, a company that manufactures copper and aluminum welding powders and copper metal grounding structures as described by Standard Industrial Classification (SIC) Code 3429: Fabricated Metal Products, Except Machinery and Transportation Equipment, and Coating, Engraving, and Allied Services.
2. Storm water catch basins around the south, southeast, and northeast of the facility drain to a retention pond in the southeast corner of the property.
3. The storm water catch basins in the northwest parking area and southwest loading docks flow into a drainage ditch, north of the facility.

Inspection Observations

1. Various metal scrap and general waste dumpsters are located in the south corner parking lot of the facility. All of the dumpsters are covered. There is some debris around some of the dumpsters. Implement good housekeeping practices, making sure the debris is always cleaned up when spilled or identified.
2. A red dumpster, near the southeast garage door, was leaking oil. Notify your scrap disposal company that the dumpster is leaking and request a sealed dumpster as soon as possible. Properly clean up the leaked oil using oil dry and properly dispose of the waste into the waste dumpster.
3. Dust and debris has accumulated in the graphite dust collector area. Implement good housekeeping practices by keeping the dust and debris swept up in that area.

Permit

1. Your Storm Water Pollution Prevention Plan (SWPPP) must be updated to meet the new requirements of the new NPDES permit #OHR000005. A copy of the new permit along with guidance materials can be found on the Ohio EPA website at:
http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

2. Quarterly visual assessments of all your storm water discharges must be performed once each calendar quarter for the entire permit term as described in Part 4.2 of the NPDES permit. Your first quarterly visual assessment of your storm water discharges must be performed by September 30, 2012, the last day of the third calendar quarter.
3. According to this facility's subsector AA1, benchmark monitoring is required for this facility. Your benchmark parameters can be found in Table 8.AA-1 of the NPDES permit. During the first 12 calendar quarters (three years), you must take only four benchmark samples, one for each of the four calendar quarters.

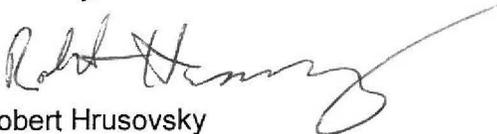
Action Items

- Update SWPPP.
- Implement good housekeeping practices around dumpsters and graphite dust collectors.
- Replace leaking dumpster with a leak-proof one.
- Begin Quarterly visual assessments this quarter.

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 28, 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. If you have further questions after August 17, 2012, please contact Dan Bogoevski, District Engineer for Ohio EPA's 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: Chester Bertel, Maintenance Coordinator, Erico Inc.
Bill Deak, Safety, Maintenance and Tooling Manager, Erico Inc.
John J. Busch, City Engineer, City of Solon