



Environmental  
Protection Agency

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

August 17, 2012

Mr. Jeff Claar  
Pratt Industries USA - Springfield  
1515 Baker Road  
Springfield, Ohio 45504

**RE: STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITY  
INDUSTRIAL STORM WATER COMPLIANCE EVALUATION INSPECTION  
NPDES NO. OHR000005/1GR01029\*EG**

Dear Mr. Claar:

On August 3, 2012, Sandra Leibfritz conducted an inspection at Pratt Industries located at 1515 Baker Road, Springfield, Ohio. You, John Wade, Brian Huber, and Rick Ridgeway represented the facility. Details on the inspection may be obtained from the enclosed inspection report.

The most current version of the Industrial Storm Water General Permit is NPDES No. OHR000005. This permit became effective on January 1, 2012, and varies significantly than the previous version (NPDES No. OHR000004). We recommend that you familiarize yourself with this new permit and update your Storm Water Pollution Prevention Plan to comply with the terms and conditions in the new permit. A copy of this permit (No. OHR000005) may be obtained at the following link: [http://www.epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx).

There are five items requiring a response. No later than November 30, 2012, we ask for a written response on the action(s) that have, or will be taken to address these five items. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104, or me at (937) 285-6034.

Sincerely,

  
Martyn G. Burt  
Environmental Supervisor  
Division of Surface Water

Enclosure

ec: Clark County Health Department

MGB\bp

Industrial Storm Water Reconnaissance Inspection

Name of facility: **Pratt Industries – USA Springfield (Corrugating Division)**

Address: **1515 Baker Road Springfield, Ohio 45504**

Permit number: **1GR01029\*EG**      Applicable permit sector: **8.B**

Date of visit: **July 27, 2012**    Time started: **9:55 a.m.**      Time ended: **12:15 a.m.**

Facility representative(s): **Jeff Claar, John Wade, Brian Huber and Rick Ridgeway**

OEPA inspector: **Sandra D. Leibfritz**

SWP3:

- A. Did the facility representative produce an SWP3?  
**Yes.**
- A1. Did it include a site map?  
**Yes. The site map was updated on May 14, 1999.**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections?  
**No.**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection?  
**No.**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges?  
**No.**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?  
**N/A. Pratt Industries' SIC code is 2653 (Corrugated Boxes). According to Section 8.B.2, NPDES No. OHR000005, benchmark monitoring is not required.**

Comments:

**There are no fuel pumps and no overnight trucking operations. Trucks are parked in a gravel lot.**

## Industrial Storm Water Reconnaissance Inspection

### Inspection records:

- B. Were inspection records available?  
**No.**

### Comments:

### Site Observations:

- C. Are materials stored exposed to weather? If Yes, list materials.  
**Yes.**
- **There is a dock area where loading/unloading occurs of paper product and recycled cardboard. Cardboard cuttings were observed throughout this area.**
  - **There is one silo on-site containing starch (dry). Starch was observed on the ground around the silo.**
- D. Are there any structural storm water management practices used onsite? **No.**
- E. Number of outfalls from site. **One.**  
**There is one outfall from this site that eventually discharges to the Mad River.**
- F. Did any show evidence of pollutants discharged in the storm water? **No.**  
If yes, describe:
- G. Other observations/comments:  
**Trucks are parked on-site in a gravel lot. There are approximately 8 trucks. At one location, staining (small area) was observed.**

**Truck maintenance is conducted off-site by a third party.**

**There is a mesh filter on the bag house for starch that is replaced every 2 years.**

**Floor drains were dyed by Dooley and determined to discharge to the city sanitary sewers.**

**Oils (hydraulic and gear) and solvents are disposed of by Krystal Keen.  
Fork lifts maintenance is conducted on-site by a third party.**

## Industrial Storm Water Reconnaissance Inspection

### Areas Requiring a Response:

No later than November 30, 2012, we ask for a written response on the action(s) that have or will be taken to address these four items:

1. **Good Housekeeping Practices.**  
Pratt needs to develop and implement good housekeeping practices as required by Section 2.1.2.2 (page 12 of OHR000005) for the silo area, the loading/unloading area and the storm water catch basins. This would include regular inspections, employee training and sweeping/cleaning (or similar action) at regular intervals.
2. **Best Management Practices.**  
Pratt needs to develop and implement best management practices as required by Section 2.1.2.1 (page 12 of OHR000005) for the area where the trucks are parked. This would include a procedure to clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants and the use of drip pans and absorbents under or around leaky vehicles and equipment.
3. **Inspections.**  
Pratt must develop and implement routine facility inspections and documentation as required by Section 4.1 (page 17 and 18 of NPDES No. OHR000005).
4. **Quarterly Visual Assessments.**  
Pratt must develop and conduct quarterly visual assessment procedures and documentation of outfall 001 for the water characteristics listed in Section 4.2 (page 19 and 20 of NPDES No. OHR000005).
5. **SIC Codes.**  
On the NOI, Pratt listed their primary SIC as 5113 (Industrial and Personal Service Paper); however, your SWP3 states that your SIC code is 2653 (Corrugated and Solid Fiber Boxes). Please confirm that your primary SIC code is 2653. Also, you must determine if you are subject to a secondary SIC code of 4