



**Environmental
Protection Agency**

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

August 22, 2012

RE: ASHTABULA COUNTY
CHARDON EAST HAULING
NPDES PERMIT NO. OHR000005
OHIO EPA PERMIT NO. 3GR01451*DG
INDUSTRIAL STORM WATER INSPECTION

Kevin Campbell
Commercial & Residential Route Manager
Waste Management of Ohio, Inc.
10237 Cutts Road
Chardon, OH 44024

Dear Mr. Campbell:

On July 24, 2012, Ohio EPA conducted an inspection at Chardon East Hauling, located at 1489 State Route 45 North, Hamden Township, Ashtabula County (site). The facility was represented by you and Robert Harding, Fleet Manager, during the inspection.

The facility's industrial activities are categorized by Standard Industrial Classification (SIC) Code 4212: Local Trucking Without Storage you and are authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (Multi-Sector General Permit), permit No. 3GR01451*DG.

Site Inspection

The inspection documented the deficiencies occurring at the facility that must be addressed via appropriate best management practices (BMP):

- According to Mr. Campbell, vehicle washing is occurring outdoors. The area where vehicle truck washing occurs is served by a storm sewer system that discharges to "waters of the State." The outdoor vehicle washing activities must be eliminated, as this discharge is not authorized under the General Storm Water Permit. The following are some methods that can be implemented to eliminate the discharge associated with vehicle washing:
 - a. Begin utilizing an offsite commercial vehicle wash;
 - b. Installing a holding tank pursuant Ohio Administrative Code Chapter 3745-42-11 and submit a permit-to-install (PTI) application that includes the following:
 1. Form A
 2. Form B8; and
 3. Antidegradation Addendum.

Approval for the holding tank must be obtained from Ohio EPA prior to the installation of the holding tank occurring. For your convenience, the PTI forms can be obtained from the following internet address; or

<http://www.epa.state.oh.us/dsw/pti/PTIForms.html>

- c. Installing or utilizing a commercially available re-circulating vehicle washing operation to collect and reuse wastewaters.
- Floor drains from the vehicle maintenance building are connected to an oil/water separator that discharges to "waters of the State." The discharge from the floor drains must be eliminated as this discharge is not authorized under the General Storm Water Permit. The floor drains must be disconnected via one of the following methods:
 - a. Capping the floor drains to eliminate the discharge;
 - b. Installing a holding tank pursuant Ohio Administrative Code, Chapter 3745-42-11, and submit a Permit-to-Install (PTI) application that includes the following:
 4. Form A
 5. Form B8; and
 6. Antidegradation Addendum.

Approval for the holding tank must be obtained from Ohio EPA prior to the installation of the holding tank occurring. For your convenience, the PTI forms can be obtained from the following internet address; or

<http://www.epa.state.oh.us/dsw/pti/PTIForms.html>

- c. Obtaining an NPDES permit for the discharge from the oil/water separator. Please contact John Schmidt at (330) 963-1175 or via e-mail at john.schmidt@epa.ohio.gov for addition information regarding this method.
- Numerous oil stains are present on the ground where vehicles are parked. Any vehicles that are leaking must have appropriate BMPs implemented (i.e. spill pans, relocation under roof, immediately repaired, etc.) to prevent the discharge of pollutants during precipitation events. The oil stains observed on the ground must be remediated.
 - Appropriate BMPs must be implemented to address the outdoor roll-off container storage area as many of the containers were uncovered and exposed to precipitation events. Residual solid waste materials were observed within some of the roll-off containers. Please be aware that any precipitation that contacts residual solid waste is considered a leachate that must be managed properly.

CHARDON EAST HAULING
AUGUST 22, 2012
PAGE 3 OF 3

Corrective Actions

A written report must be submitted to Ohio EPA, within fourteen days of receiving this notification, that details how the deficiencies have been or will be addressed. The written report must also include dates detailing when each corrective action (i.e. BMP) was or will be implemented. The facility's storm water pollution prevention plan may be required to be revised to be reflective of the implemented corrective actions.

Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

Ec: Kevin Campbell, Waste Management of Ohio, Inc