



**Environmental
Protection Agency**

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

August 28, 2012

RE: LAKE COUNTY
CITY OF MENTOR
INDUSTRIAL STORM WATER
MT HEAT TREAT INC.

NOTICE OF VIOLATION

Sonja Blank
MT Heat Treat Inc.
8665 Station St.
Mentor, OH 44060

Dear Ms. Blank:

On August 1, 2012, I performed an inspection of your facility located at 8665 Station St. in Mentor, OH. I was accompanied on my inspection by Kelly McVay and Christina Visocky, interns within of our Division of Surface Water. I met with Sonja Blank, Office and Safety Manager, and O.V. Mathews, Owner. My inspection was conducted to determine compliance with the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity #OHR000005. Our records indicate that MT Heat Treat Inc. has obtained coverage under this general permit and has been assigned a facility permit #3GR01396*DG. Industrial activities at MT Heat Treat Inc. are categorized under Standard Industrial Classification (SIC) Code 3398: Metal Heat Treating. Thus, this facility is subject to the sector-specific requirements contained in Part 8 Subpart F of the NPDES permit (subsector F5).

My inspection revealed the following administrative violation of the NPDES permit:

- **Failure to retain a copy of the current Storm Water Pollution Prevention Plan (SWPPP) at the facility.** This is a violation of Part 5.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. When Ohio EPA requested to see the SWPPP, MT Heat Treat Inc. did not produce the plan. Rather, Ms. Blank indicated it had been sent to Ohio EPA for approval in the early 1990s. Ohio EPA has no record that the SWPPP was ever submitted. Regardless, it is the obligation of the permittee to retain a copy of the current SWPPP at the facility and make it immediately available to Ohio EPA.

To ensure that MT Heat Treat Inc. has the information needed to comply with the NPDES permit, I provided Ms. Blank a copy of general permit #OHR000005, guidance material from the

Dumpsters should be inspected periodically to ensure they are in good condition and are not leaking.

In addition, we noted some items that may be of interest to our Division of Materials and Waste Management (DMWM). We noted that drums containing used oil were not labeled with the words "Used Oil". Rather, they were labeled with "R/C" for reclaimed oil. Our records show that MT Heat Treat received a Notice of Violation dated February 5, 2010, for improperly labeling used oil drums in the past. Further, Mr. Mathews indicated that spent sand from the sandblaster is disposed by giving it away to a gentleman that puts it on his lawn. Please be aware that spent sand is at least a solid waste and must be properly disposed. Use in the manner described likely requires beneficial reuse approval from DMWM. Please consult with DMWM on these matters.

Please provide me with a letter of response indicating the actions you will take to address the violation and concerns noted above. A copy of the SWPPP must accompany the response letter and the plan must reflect any changes to storm water pollution prevention practices made as a result of this inspection and required as a result of the general permit renewal. Your response must be received **by September 28, 2012**.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

Cc: Ken Filipiak, City Manager, City of Mentor
Richard Harvey, Chief of Fire Department, City of Mentor
Laura Kuns, Lake County General Health District

Ecc: Natalie Oryshkewych, Ohio EPA, DMWM Manager, NEDO



Fig 1 (LEFT). The Floor drain inside the covered loading dock connects to the storm sewer system. Furnaces are located adjacent to the loading dock to the right of the area pictured here.

Fig 2 (RIGHT). A view inside the floor drain pictured in Fig 1. A black dust was observed inside the catch basin.



Fig 3 & 4. Although stored indoors, drums and totes containing used oil and a water/oil mixture are stored near doorways. These items should either be moved away from doorways or stored on containment trays or within secondary containment.



Fig 5 (LEFT). Stains on the pavement around the trash dumpster indicate leaks or spills have occurred. The dumpster lid is ajar.



Fig 6 (RIGHT). The water in the mop bucket appears black. MT Heat Treat indicated that this water is disposed in a "recycle drum".



Fig 7. Because access to the storm sewer system outfall is difficult, MT Heat Treat may wish to consider taking samples for quarterly visual monitoring at the first manhole above the outfall (pictured here). There are no significant storm water pollutant inputs between that manhole and the outfall.

Fig 8. The label on the spill kit is starting to come off.