



**Environmental  
Protection Agency**

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

Re: Sandusky County  
Glatfelter Company  
Industrial Storm Water

September 13, 2012

Mr. William Subsara  
Operations Manager  
Glatfelter Company  
2275 Commerce Drive  
Fremont, Ohio 43420

Dear Mr. Subsara:

On August 21, 2012, a storm water compliance inspection was made of Glatfelter Company in the City of Fremont, Sandusky County, to determine compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Industrial Activity (IGP) issued to Glatfelter Company. The inspection consisted of a tour of the grounds outside of this facility and a review of the Stormwater Pollution Prevention Plan (SWP3). Paula Wentzell of Glatfelter was also present during the inspection.

Glatfelter Company manufactures base paper for carbonless coatings and carbonless ink-jet paper. I do not have the standard industrial classification code for Glatfelter but it appears that Glatfelter Company would be regulated under Section B (paper and allied products) of the IGP. Observations of the outside inspection included a silo for the storage of corn starch that is not in use, a rail spur with receiving bays that is not in use, a trash compactor located near a storm drain that goes to a storm containment area, and a 7,000 gallon containment area that is valved. Generally, the storm water that is captured in this area is discharged to the pretreatment system that discharges to the municipal sewer system but there is a locked valve on the containment area that could route the discharge to a nearby ditch

A review of the SWP3 shows that the SWP3 needs to be updated and recertified. Quarterly inspections are being done and should include a visual inspection of the discharge of storm water, which is to be documented and kept with the SWP3.

We had discussed the possibility of whether Glatfelter Company would be eligible to submit a Notice of No Exposure (NOE) certification because the only exposure that Glatfelter Company has at this time is the hose connection within the containment area, and that the containment area is discharged to the pretreatment system. We feel that if the valve from this containment area were permanently disabled that there was no possibility of discharge of storm water to the ditch, you would be able to submit an NOE instead of continuing the IGP.

If you have any questions, you may contact me at (419) 373-3016 or by e-mail at [patricia.tebbe@epa.state.oh.us](mailto:patricia.tebbe@epa.state.oh.us).

Sincerely,

Patricia A. Tebbe, P.E.  
Division of Surface Water

/jim

ec: Tracking