



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

May 23, 2013

RE: ASHTABULA COUNTY  
MASCO CABINETRY MIDDLEFIELD, LLC  
NPDES PERMIT NO. OHR000005  
OHIO EPA PERMIT NO. 3GR01386\*DG  
INDUSTRIAL STORM WATER INSPECTION

Paul Shamrock  
Masco Cabinetry Middlefield, LLC  
15535 South State Road  
P.O. Box 1055  
Middlefield, OH 44062

Dear Mr. Shamrock:

On May 6, 2013, Ohio EPA conducted an inspection at Masco Cabinetry, Middlefield LLC (PL 3), located at 150 Grand Valley Avenue, City of Orwell, Ashtabula County (facility). During the inspection, the facility was represented by you; Robert Naftanail, Marie Shelton, Environmental Assistant; Health and Safety Manager; and Harry Wolfe, Environmental Health and Safety Manager.

The facility's industrial activities are categorized by Standard Industrial Classification (SIC) Code 2434: Wood Kitchen Cabinets and are authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (Multi-Sector General Permit), permit No. 3GR01386\*DG.

### **Site Inspection**

The inspection documented the following:

- The facility's storm water pollution prevention plan (SWP3) was revised February, 2013.
- Weekly and monthly routine facility inspections are occurring. In addition, security performs daily inspections of the facility that include storm water aspects. The last monthly inspection occurred April 4, 2012. Section 5 of the facility's SWP3 details that facility inspections are to occur on a quarterly frequency. Section 5 of the facility's SWP3 must be revised to be reflective of the inspection frequencies occurring at the facility. Please note that since security is not performing a complete facility storm water inspection, these inspection frequencies do not need to be included within the revised SWP3.
- Quarterly visual assessments of the facility's outfall is occurring and being documented. The last quarterly visual assessment occurred February 11, 2013.

- An annual employee training program, entitled "Tomorrow's Training Today", is being implemented. Appropriate employee training records are being maintained that document the last training event occurred July 31, 2012. The facility's next training event is expected to occur July 31, 2013.
- A preventative maintenance program of equipment is being implemented that is based upon an electronic schedule.
- The facility performed an annual comprehensive site inspection on November 26, 2012.
- A non-storm water discharge certification occurred on May 6, 2010.
- The trash compactor was leaking oil during the inspection due to a failed cover (Figure 1). Employees began cleaning this area immediately upon discovery. Via an email dated May 8, 2013, Mr. Wolfe provided verification that the trash compactor was repaired. Ohio EPA recommends that this area be inspected during the facility's routine inspections.
- The sludge dumpster was leaking a white leachate that was discharging into a storm sewer inlet (Figure 2). Employees began cleaning this area immediately upon discovery. Via an email dated May 8, 2013, Mr. Wolfe provided verification that the sludge dumpster area was cleaned. In addition, the sludge dumpster has been covered. Ohio EPA recommends that this area be inspected during the facility's routine inspections.
- A drum storage area was located outdoors where uncapped drums were observed (Figure 3). The drums must be properly capped to minimize the potential to discharge pollutants during precipitation events.

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

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM:ddw



**Figure 1** - The trash compactor was leaking oil during the inspection due to a failed cover.



**Figure 2** - The sludge dumpster was leaking a white leachate that was discharging into a storm sewer inlet.



**Figure 3** - A drum storage area was located outdoors where uncapped drums were observed.