



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

May 31, 2013

Mr. Rick Hartzell  
HEF USA  
2015 Progress Drive  
Springfield, Ohio 45505

**RE: HEF USA – COMPLIANCE EVALUATION INSPECTION, CLARK COUNTY  
NO EXPOSURE CERTIFICATION, NPDES NO. 1GRN00168\*DG  
NOTICE OF VIOLATION**

Dear Mr. Hartzell:

On May 29, 2013, Sandra Leibfritz conducted an inspection at HEF located at 2015 Progress Drive, Springfield, Ohio. You were representing the facility.

On April 18, 2008, HEF USA received a “No Exposure” certification. The intent of the No Exposure certification is to provide facilities with industrial materials and activities that are entirely sheltered from storm water a way of complying with the storm water permitting requirements of the Clean Water Act. On the day of the inspection, Ms. Leibfritz observed materials exposed to the elements. The specific areas of concern are the air scrubber, the air compressor blowdown, the open dumpster of scrap metal, the catch basin in the loading/unloading area, pallet storage area and the hazardous material that was stored inside near the overhead door without secondary containment. The certification of “No Exposure” is therefore not valid.

The discharge of storm water associated with industrial activity to waters of the state without valid coverage under the NPDES permit program is a violation of Ohio Revised Code 6111.04, Water pollution and sludge management violations prohibited.

No later than July 12, 2013, HEF USA shall apply for coverage under the general storm water permit associated with industrial activity (NPDES No. OHR000005). The link to this permit and to the Notice of Intent was provided to you in an email. This permit will require HEF USA to develop and implement a Storm Water Pollution Prevention Plan (SWP3). A sample SWP3 template was also provided to you in an email. The SWP3 should not take more than 60 days from the date of this letter to develop and implement.

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You were also unaware of where your catch basin at the loading dock discharges to. You believe that it is pumped to the City; however, Ms. Leibfritz identified two 12-inch pipes entering the drainage ditch on the northwest side of your property. As part of your SWP3, you will need to identify where your storm water discharges.

There seems to be some confusion between Ohio EPA and HEF USA regarding the storm water requirements for the air scrubber. Ohio EPA considers the storm water that contacts the air scrubber to be contaminated. You will need to repair the berm on the containment pad to the air scrubber and repair/maintain the sump that discharges to the City's sanitary sewer. In a letter dated May 23, 2011, Matt Walbridge of Ohio EPA recommended making the containment pad *smaller* to minimize the amount of storm water that would enter the sump that ultimately discharges to the City, not to eliminate it.

There were two screw caps on your sanitary lateral (cleanout). These caps are severely damaged and need to be replaced *and* maintained. The open line allows storm water to inflow into the sanitary sewer that causes the City to incur cost to treat clean water. You mentioned that these caps were damaged by the lawn mower hitting them. You might want to investigate putting a rubber mulch tree ring or equivalent around the pipe. This will keep the grass and the lawn mower away from the pipe.

You mentioned that you are looking into discharging the nitrifying salts to the City. As a reminder, you will need to contact Jeff Yinger at (937) 324-7623, at the city of Springfield to obtain permission to discharge this type of waste water to their sanitary sewers. Also, if you need to install pretreatment units for this type of waste water, you will need to contact Matt Walbridge at (937) 285-6095 of Ohio EPA to obtain a permit to install for the pretreatment unit.

Please provide written notification to this office, when you have submitted the Notice of Intent for coverage under the general permit, when your SWP3 has been developed and implemented and when the berm to the containment pad and sump has been repaired. If you should have any questions, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,

  
Martyn G. Burt  
Environmental Supervisor  
Division of Surface Water

ec: Clark County Combined Health District  
Jeff Yinger, Springfield WWTP ([jyinger@ci.springfield.oh.us](mailto:jyinger@ci.springfield.oh.us))

MGB\bp