



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

June 17, 2013

RE: LORAIN COUNTY  
SHEFFIELD TOWNSHIP  
INDUSTRIAL STORM WATER  
ROWLAND ENTERPRISES  
3GR01387\*EG

Steve Mims  
Construction/Maintenance Manager  
Rowland Enterprises  
41641 North Ridge Rd.  
Elyria, OH 44035

Dear Mr. Mims:

On May 23, 2013, Ohio EPA conducted an inspection at the Rowland Enterprises facility located at 5109/5111 Pearl Road. Our records indicate that this facility has coverage under the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activities #OHR000005. However, it appears that storm water runoff from your facility is no longer subject to NPDES regulations. Rowland Enterprises was previously engaged in the trucking business and used the facility as a maintenance garage for its trucks. However, you indicated that trucking operations ceased in 2010 and that now, Rowland Enterprises is strictly a property management company. The company leases and maintains commercial buildings and properties. The facility at 5109/5111 Pearl Road serves as a maintenance facility for equipment associated with typical property maintenance, e.g., lawnmowers, trimmers, etc. Whereas the primary standard industrial classification (SIC) code for the trucking company is a regulated industrial storm water source, property management is not. Thus, this facility no longer requires an NPDES permit.

We advise you to terminate NPDES permit coverage by submitting a Notice of Termination (NOT). You should submit the NOT for your facility **no later than 14 days after receiving this letter**. The form and instructions can be found at the Ohio EPA website under the Forms and Permits tab at: <http://epa.ohio.gov/dsw/storm/index.aspx>

If you do not terminate NPDES permit coverage, you will be required to comply with the NPDES permit. This permit requires that you implement a Storm Water Pollution Prevention Plan (SWPPP) and comply with inspection, monitoring and recordkeeping requirements. This includes quarterly visual assessment of storm water discharges, routine facility inspections, comprehensive facility inspections and annual reporting, employee education, good housekeeping and other such pollution prevention practices.

That said, we reviewed the facility with you and noted that there are a number of storm water pollution sources. Although an NPDES permit may not be required for the facility due to a change in SIC code, be aware that the Director can designate any facility for regulation under the NPDES permit program if it is a significant source of storm water pollution. To prevent this from occurring, I offer the following comments to improve the quality of storm water runoff from your facility:

1. There were multiple drums outside the garage that should be either removed and properly disposed, moved inside, or placed in secondary containment (see Fig 1). This includes the red drum labeled "Waste Oil" (see Fig 3). Please note that this drum is improperly labeled. Hazardous waste rules stipulate that containers of used oil be labeled "Used Oil".
2. Secondary containment is also recommended for the diesel tank (see Fig 2). It is also a good idea to have a spill kit nearby and to store it under some sort of protection such as an overhang or roof.
3. Floor drains inside the garage should be capped or be redirected to sanitary sewers if they are currently connected to storm sewers or discharge directly to the environment.
4. We observed sediment from the gravel parking lot discharging into the drainage channel tributary to Eschtruth Ditch. Sediment pollution can be reduced by redressing the parking lot with gravel or paving.
5. We observed an oil sheen in the parking lot near the parked trucks (see Fig 4). It is my understanding that these are not your trucks but those of a tenant in one of the buildings. You should speak with your tenant to ensure that measures are taken to address oil leaks from vehicles, e.g., place drip pans under leaks, store leaking trucks inside, perform maintenance in a timely manner, etc.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1125 or by e-mail [julianna.murphy@epa.state.oh.us](mailto:julianna.murphy@epa.state.oh.us).

Sincerely,



Julianna Murphy  
Assistant to the District Engineer  
Division of Surface Water

JM:ddw

Enclosure

cc: Trustees, Sheffield Twp.

ec: Dan Bogoevski, DSW, NEDO



**Figure 1:** Dispose of or properly contain drums.



**Figure 2:** Diesel tank needs secondary containment and spill kit near by. Covering is preferred as well.



**Figure 3:** Should be labeled "Used Oil"



**Figure 4:** Oil sheen on the ground. Right of white post.



**Figure 5:** Inflow Drainage taken  
Nov. 27<sup>th</sup>, 2012



**Figure 6:** Inflow Drainage taken  
May 23<sup>rd</sup>, 2013



**Figure 7:** Outflow Drainage taken Nov, 27<sup>th</sup>, 2012