



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

July 17, 2013

Mr. Robert Baker, General Manager  
Coca Cola Refreshments USA, Inc.  
5100 Duck Creek Road  
Cincinnati, Ohio 45227

**RE: Coca Cola Refreshments USA, Inc. NPDES Permit # 1GR01266\*DG  
Industrial Storm Water Site Inspection**

Dear Mr. Baker:

On Friday, June 28, 2013, I inspected the Coca Cola Refreshments USA facility at 5100 Duck Creek Road, Cincinnati, Ohio to assess the facility's compliance with the Industrial Storm Water Discharge Permit that was issued to Coca Cola Refreshments USA on May 15, 2012 (1GR01266\*DG). Charles Thomas, Quality Control Manager and Mauricio Rivera, Management Systems Manager, represented Coca Cola Refreshments USA during the inspection.

Based on my observations of the site's operations, it appears the facility is in compliance with the terms of its Industrial Storm Water Discharge Permit. A copy of my inspection report is enclosed.

It also appears the facility could certify that it meets the requirements for a "no exposure" option, which reduces many of the requirements imposed by its Industrial Storm Water Discharge Permit. If Coca Cola Refreshments USA decides to pursue this option, it can self-certify by answering "no" to each of the 11 questions in the "exposure checklist" at the top of Page 2 of the No Exposure Certification Form, which is available at the following web link:

[http://www.epa.ohio.gov/portals/35/storm/no\\_exposure\\_certification\\_fis.pdf](http://www.epa.ohio.gov/portals/35/storm/no_exposure_certification_fis.pdf)

The completed checklist is to be signed and sent in to Ohio EPA's Central Office in Columbus. This certification must be renewed every 5 years, assuming the company's activities have not changed such that "significant" materials are managed outdoors and exposed to storm events. If the company cannot answer "no" to these questions, the requirements of the industrial storm water discharge permit will remain in effect.

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If you have any questions related to this inspection, I can be reached at (937) 285-6098, or via email at [Ron.Ware@epa.ohio.gov](mailto:Ron.Ware@epa.ohio.gov).

Sincerely,



Ron Ware  
Environmental Specialist II  
Division of Surface Water

RW/tb

Enclosure

cc: Charles Thomas, Coca Cola Refreshments USA  
Mauricio Rivera, Coca Cola Refreshments USA

**Industrial Storm Water Compliance Evaluation Inspection**

**Name of Facility:** Coca-Cola Refreshments USA, Inc.

**Address:** 5100 Duck Creek Rd.  
Cincinnati, Ohio 45227

**Permit number:** 1GR01266                      **Applicable permit sectors:** P and U

**Date of visit:** 6/28/13                      **Time started:** 9:15 AM                      **Time ended:** 11:25 AM

**Facility representatives:** Charles Thomas, Quality Assurance Manager (513) 527-8412  
Mauricio Rivera, Management Systems Manager (513) 527 8357

**OEPA inspector:** Ron Ware

**SWP3:**

**A. Did the facility representative(s) produce an SWP3?    Y**

The SWP3 included an assessment and description of Sector P specific Potential Pollutant Sources including excess/recycled wash water storage with secondary containment and fueling areas that could contribute pollutants to storm water discharges.

The SWP3 included an assessment and description of Sector U specific Potential Pollutant Sources that could contribute to pollutants to storm water discharges including the contracting of pest control to Ecolab, and landscaping to Brickman Group Landscaping.

No individual NPDES permit is required to be in the SWP3 for this facility as vehicle/equipment wash water is under roof and goes to the sanitary sewer. While no copy was attached to this facilities' SWP3 for any industrial user permit issued under a local pretreatment program, Mr. Thomas indicated that all non-storm water discharge permit conditions or pretreatment conditions have been implemented at the facility.

**A1. Did the SWP3 include a site map?    Y**

In regards to the Sector P portion of the facility, the SWP3 Drainage Area Site Map identified the following areas of the facility and indicated whether activities occurring there may be exposed to precipitation and/or surface runoff:

- Fueling stations
- Vehicle/equipment maintenance or cleaning areas
- Storage areas for vehicle/equipment with actual or potential fluid leaks
- Loading/unloading areas
- Areas where treatment, storage or disposal of wastes occur
- Liquid storage tanks, processing areas, and storage areas.

In regards to the Sector U portion of the facility, there are no areas of the facility where Sector U type activities occur that would be exposed to precipitation/surface runoff, so no Sector U type components are shown on the site map.

**A2. Did it include schedules and procedures for the Routine Facility Inspections (RFI)? Y**

The RFI's are done at least quarterly. They include the following Sector P specific Additional Control Measures/Best Management Practices (BMPs):

1. Vehicle and Equipment Storage Areas - To minimize the potential for storm water exposure to leaky or leak-prone vehicles/equipment awaiting maintenance the following control measures are used: indoor storage; installation of berms or dikes; use of absorbents; and roofing or covering vehicle equipment storage areas.
2. Fueling Areas - To minimize contamination of storm water runoff from fueling areas the following control measures are used: covering the fueling area; using spill/overflow protection and cleanup equipment; minimizing runoff of storm water to the fueling area; using dry cleanup methods; and treating and/or recycling collected storm water runoff.
3. Material Storage Areas - The facility maintains all material storage vessels (e.g., for used oil/oil filters, spent solvents, paint wastes, hydraulic fluids) and prevents contamination of storm water by plainly labeling them. In addition, the following control measures are used: storing the materials indoors; installing berms/dikes around the areas; minimizing runoff of storm water to the areas; using dry cleanup methods; and treating and/or recycling collected storm water runoff
4. Vehicle and Equipment Cleaning Areas - To minimize contamination of storm water runoff from all areas used for vehicle/equipment cleaning the following control measures are used: performing all cleaning operations indoors; covering the cleaning operation; and ensuring that all wash water drains to a proper collection system (i.e., not the storm water drainage system)
5. Employee Training - Personnel are trained at least once a year to address the following activities: used oil and spent solvent management; fueling procedures; general good housekeeping practices; proper painting procedures; and used battery management.

If repairs and/or replacements of BMP control measures are needed, the SWP3 does indicate that the facility would plan for and make repairs or replacements as needed. Spill Prevention and Response procedures are noted in the RFI procedures of the SWP3. The RFI's are done when the facility is in operation. Weather conditions at the time of the RFI's are noted. If a discharge is happening at the time of an RFI it is described.

**A3. Did the SWP3 include schedules and procedures for the comprehensive annual facility inspection? Y**

**A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? Y**

The SWP3 indicates that the information gathered for the quarterly visual assessment includes the following: sample location; sample collection date/time; visual assessment of the samples (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other indicator of polluted storm water); name and signature of person conducting the visual assessment; nature of the discharge (i.e., runoff or snowmelt); likely sources of any observed contamination; and an indication that the sample was collected within the 1<sup>st</sup> 30 minutes of the rain event and at least 72 hours from the last storm event. The following visual inspection areas specific to Sector P are included:

Storage areas for vehicles/equipment awaiting maintenance;

Fueling areas;

Indoor and outdoor vehicle/equipment maintenance areas

Material storage areas

Vehicle/equipment cleaning areas

Loading/unloading areas

The following visual inspection areas specific to Sector U are included:

Loading and unloading areas for all significant materials

Storage areas, including associated containment areas

Waste management units

Vents and stacks emanating from industrial activities

Spoiled product and broken product container holding areas

Staging areas

**A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? N/A**

**Comments;** Sector P "Land Transportation and Warehousing" SIC 4213 and Sector U3 "Beverages" SIC 2086 do not have required benchmarks.

**Inspection records:**

**B. Were inspection records available? Yes**

**Site Observations:**

- C. Are materials stored exposed to weather?      **No**
- D. Are there any structural storm water management practices used onsite? Examples include grassy swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens.

Yes. The facility uses rain barrels to collect storm runoff from the roofs, and reuses this collected storm water for landscape maintenance.

- E. Number of outfalls from site/number inspected:      **02/02**
- G. Did any show evidence of pollutants discharged in the storm water?      **No**

- H. **Other observations/comments:**      It is possible that the site may qualify for a No Exposure Certification. However, one issue would first need to be addressed: The truck connection end of a hose used to pump liquid from the BOD tank to tanker trucks currently is left on the ground to prevent trucks from accidentally tearing the hose from the building. This does result in a relatively small drainage of concentrated sugar water from the hose to the cement pad loading area after the hose is disconnected from the truck. As a storm water drain is within approximately 5-10 feet of where the hose rests, the end of the hose should be placed in an impermeable container such that no waste from the hose is discharged to waters of the State.

Once this issue has been dealt with, you may wish to consider applying for a No Exposure Certification Form (includes instructions), which can be found at: [http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater\\_NoExposure.docx](http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.docx) or in pdf form at: [http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater\\_NoExposure.pdf](http://epa.ohio.gov/Portals/35/storm/IndustrialStormWater_NoExposure.pdf) A fact sheet can be found at: <http://www.epa.gov/npdes/pubs/fact4-0.pdf> and a guidance document can be found at: <http://www.epa.gov/npdes/pubs/noxguide.pdf>