Ohio EPA
40 years and moving forward

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

August 28, 2013

RE: Crown Cork & Seal
Storm Water Compliance Inspection
Permit 1GR00609*EG

Mr. Rene Santiago
Crown Cork & Seal USA, Inc.
5005 Springboro Pike
Dayton, Ohio 45439-2974

Dear Mr. Santiago:

On August 23, 2013, I met with Robert Lucas and you to conduct an industrial storm water inspection. The inspection included a review of your storm water pollution prevention plan (SWP3), required inspection records and a tour of your facility. I observed your metal and cardboard recycling systems, the adhesive delivery station, and the sheltered storage area for waste and hazardous materials. Although not associated with storm water, you also showed me the operations involved in the manufacture of pop-top can lids; thank you for the opportunity to see that interesting and impressive process.

Storm Water Pollution Prevention Plan

Although you were able to produce an SWP3 required by the Industrial Storm Water General Permit, I believe the plan needs to be updated so that it identifies the current SWP3 team members by name (or title) and describes their responsibilities. Also, the plan must include the required certification statement and be signed and dated by a current responsible corporate officer of the facility.

I otherwise believe there is an opportunity to review the contents of the plan and, in light of your facility having limited amounts of material exposed to precipitation, streamline it to cover the very limited areas where exposure exists.

Based on the digital images you showed me, I believe Crown's plan needs to especially address the scrap aluminum handling system located on the roof over the compactors, and that the inspection checklist needs to include the roof area along with the pavement around the compactor bins.

Crown is covered by sector AA-1 of the general storm water permit which establishes both benchmark criteria and special requirements for the contents of the SWP3. I provided you the sector-specific permit language at the time of the inspection, and it is necessary for you to ensure your plan includes these required elements.

Please review the plan, amend it as appropriate, and certify the updated plan by November 1, 2013. I would appreciate you notifying me when this action is completed.

Benchmark Monitoring

It did not appear that Crown has performed the benchmark monitoring for aluminum, zinc and nitrate+nitrite nitrogen as required by Sector AA-1 of the permit. The permit requires four samples be collected in different calendar quarters, sometime during the first three years of the permit (by January 1, 2015) – although it is also acceptable for the sampling to occur in as little as a 12-month period. Please make arrangements to ensure the required monitoring occurs by January 1, 2015 and that results are reported using Ohio EPA's electronic discharge monitoring report (e-DMR) system.

I believe that sampling is only necessary for the storm sewer outlet to which the compactor area drains, as the other outlet did not appear to convey storm water associated industrial activity. The small awning over the connection used for adhesive delivery and the covered drip tray below the connection qualifies as no-exposure.

Stream Hardness

To aid in determining the benchmark value for zinc, which is dependent on the hardness of the stream, you can use available data in lieu of performing your own sampling and analysis. Our stream monitoring records for Holes Creek at SR 741 indicate a hardness of 260 mg/l would be appropriate to use to determine the benchmark value. This hardness value results in the zinc benchmark being 0.27 mg/l.

Please provide a written response to this letter by September 16th, indicating your plans for addressing the items I have presented. If you have any questions about this letter or the attached inspection form, please call me at (937) 285-6095.

Sincerely,

Matt Walbridge
Environmental Specialist II
Division of Surface Water

MW/tb

Attachment

Industrial Storm Water Reconnaissance Inspection Report

Name of facility: ***Crown Cork & Seal***

Address: ***5005 Springboro Pike***
Dayton, OH 45439

Permit number: ***1GR00609*EG*** Applicable permit sector: ***AA-1***
(Their SIC code is 3411)

Date of visit: ***August 23, 2013*** Time started: ***10:30*** Time ended: ***12:30***

Facility representative(s): ***Robert Lucas – Plant Manager and Rene Santiago – Electrical Engineer***

OEPA inspector: ***Matt Walbridge***

SWP3:

A. Did the facility representative produce an SWP3? Y ~~/ N / Not requested~~

A1. Did it include a site map? Y ~~/ N~~

A2. Did it include schedules and procedures for the quarterly routine facility inspections? ~~Y /~~ N

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? Y / N

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

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

Comments:

A. It appeared to have been reproduced recently in response to my calling to conduct the inspection. It appeared to contain a lot of generic/irrelevant discussions.

A1. The map(s) were somewhat lacking in clarity and labeling (i.e. site drainage pattern).

A2. There wasn't a schedule for the inspections and I didn't see any personnel identified as being responsible for conducting them. The one completed checklist I saw didn't seem pertinent to actual facility operations.

A3. Not that I saw.

A4. I believe it was part of the quarterly inspection checklist.

A5. They haven't performed any benchmark monitoring and I did not see that the plan laid out a schedule or describe procedures.

Inspection records:

B. Were inspection records available? Y ~~/ N~~

Comments:

There were only one or two and they were somewhat cursory.

Site Observations;

C. Are materials stored exposed to weather? Y ~~/ N~~
If Yes, list materials.

Small (almost fugitive) amounts of scrap pieces of stamped aluminum that escape the compactor when it is removed from the site daily for recycling. There was some hydraulic oil staining from the cardboard compactor that was said to be caused by a ruptured hose. All three compactors are under roof (although the sealed containers are not).

D. Are there any structural storm water management practices used onsite? ~~Y /~~ N ~~/ Not sure~~
Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens .

E. Number of outfalls from site/number inspected: 2 / 2

G. Did any show evidence of pollutants discharged in the storm water? ~~Y /~~ N

If yes, describe: ***Site is clean and orderly. Their product and processes is not compatible with stormwater contamination and waste material is managed carefully to maximize its value. Waste materials are all protected from exposure to precipitation.***

H. Other observations/comments:

I think their plan could be much more focused (and therefore smaller) to concentrate on the adhesive loading station, the compactor dock and the roof over the dock where the stamped metal air handling system is located. The inspection form could be better tailored to the source and pathway with a focus on making sure scrap aluminum is kept cleaned up and that the compactor hydraulic system is in good order. Periodic inspections of the room over the compactor area would also seem to be easy to address. With only a few observations to make, the checklist would seem to be short (a page).