



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 700220230000118077941
RETURN RECEIPT REQUESTED

August 31, 2009

Mr. Robert Hooper
Potters Industries Inc. – Cleveland Plant
2380 West Third Street
Cleveland, Ohio 44113

FACILITY ID: 13-18-00-2733
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Hooper:

On August 13, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Potters Industries Inc. – Cleveland Plant (Potters) to submit a corrective action plan stating how Potters will promptly remove and prevent deposited glass beads and cullet from the adjacent roadway. CDAQ is in receipt of a corrective action plan dated August 27, 2009, with a copy of Potters' Stormwater Pollution Prevention Plan. Potters is required to promptly remove any materials that migrate into the roadway.

The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Potters: 13-18-00-2733.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/lk

cc:

John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318002733\2009-08-13 NEAR.doc

Bob Hooper (Cleveland)

From: Bob Hooper (Cleveland)
Sent: Thursday, August 27, 2009 9:45 AM
To: Tim Hellem (Chester)
Cc: Bob Hooper (Cleveland)
Subject: FW: Pressure drop

Post-it® Fax Note	7671	Date	# of pages ▶
To	LINDA KIMMEY	From	TIM HELLEM
Co./Dept.		Co.	POTTERS INC
Phone #		Phone #	
Fax #		Fax #	

-----Original Message-----

From: Villarreal, Betsey (GE Infra, Energy) [mailto:Betsey.Villarreal@ge.com]
Sent: Monday, August 10, 2009 1:54 PM
To: Bob Hooper (Cleveland)
Subject: Pressure drop

- > Hi Bob,
- >
- > In follow up to our conversation, Pressure drop will vary depending on how a system is sized. Your furnace collector is sized for full production and is sized properly:
- >
- > ACFM: 18,500
- > Total cloth area: 4,692
- > A/C ratio: 3.9:1
- >
- > However, since your are operating at reduced capacity and have the fan volume reduced your system is now running:
- >
- > ACFM: 5,000
- > Total cloth area: 4,692
- > A/C ratio: 1.06:1
- >
- > Running at this reduced air volume, low air-to-cloth ratio/C) and reduced grain loading will make the dust collector run at very reduced pressure drops, with the top pressure drop less than 6" of water column and the bottom pressure less than 1" water column. The lower A/C ratio will also effect your CAN velocity (upward flow between the filters) and will be greatly reduced. Since you are running the 20 > -> 40 mesh course material, a higher percentage of dust will drop out into the hopper and not even make it up to the filters and no pressure drop will be created.
- >
- > Low-pressure drop does not mean you are not filtering efficiently.
- >
- > Let me know if you have any questions.
- >
- > Thanks!
- >
- > Betsey U. Villarreal
- > Sr. Technical Account Manager
- > GE Energy
- > Environmental Services
- >
- > T +1 816 313 4411
- > T +1 800 821 2222
- > F +1816 353 1873
- > Betsey.villarreal@ge.com
- >

August 27, 2009

Ms. Linda Kimmy
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Dear Ms. Kimmy:

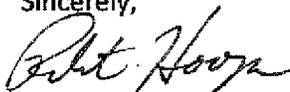
This letter is in response to your Notice of Violation for Fugitive Dust Emissions dated August 13, 2009 resulting from an accumulation of glass beads and cullet in the street adjacent to our driveway.

Glass in this area can be the result of two sources:

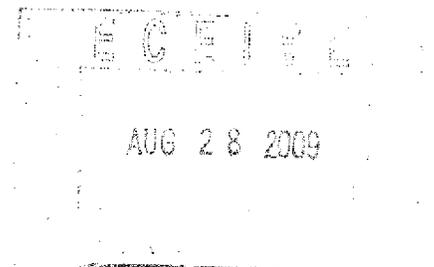
- Heavy rains that carry glass down our driveway. Due to the mild slope of the driveway, this glass normally does not reach the street and is cleaned up (per our Stormwater Pollution Prevention Plan – see attached).
- Wet glass dust and/or fine beads stick to truck tires traveling through our yard (either to unload cullet or to pick up product) and are deposited on our driveway and to a much lesser extent on the street. The glass can be wet as a result of rain, melting snow, or water used to suppress dust during the dryer months.

Wet glass dust does not sweep up and the levels are generally too small to shovel. In most cases, we must wait for the glass to dry and then it is swept up and returned to our cullet pile. The glass noted in this NOV was cleaned up as soon as it was dry and returned to our cullet pile. In order to control and prevent the egress of glass from our property, enclosed please find a copy of our Stormwater Pollution Prevention Plan, in particular, sections 5.4 – 5.6.

Sincerely,



Robert Hooper
Plant Manager



**STORMWATER POLLUTION PREVENTION
PLAN
AND
BEST MANAGEMENT PRACTICES PLAN
POTTERS INDUSTRIES, INC.
CLEVELAND, OHIO**

POSITION	SIGNATURE	DATE
PLANT MANAGER	<i>Robert Horgan</i>	2/27/09

1.0 **FACILITY LOCATION AND MAILING ADDRESS**

POTTERS INDUSTRIES, INC.
2380 WEST THIRD STREET
CLEVELAND, OHIO 44113
CUYAHOGA COUNTY

2.0 **NPDES PERMIT NUMBER**

OHR000004

3.0 **POLLUTION PREVENTION TEAM AND DESIGNATED RESPONSIBILITIES**

Robert Hooper, Plant Manager	Contact Phone: 216-337-4914
Robert Jenkins, Unit Manager	Contact Phone: 440-465-0889

It is the responsibility of the Plant Manager to coordinate implementation of the Stormwater Pollution Prevention and Best Management Practices Plan. The Plant Manager will delegate Authority to plant personnel to implement specific portions of the Plan.

The Plan will be amended whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential of pollutants to the surface water. Any Plan revisions will be coordinated by the Plant Manager with support from Potters Corporate Health, Safety, and Environmental Department.

4.0 **DESCRIPTION OF POTENTIAL POLLUTANT SOURCES**

4.1 **SITE PLAN**

The location and physical description of the facility is detailed on the following maps:

- A site map of the plant showing the plant's location in relation to transportation routes and the Cuyahoga River. This map also shows the location of the stormwater sewers.
- A City of Cleveland map showing the location plan and profile of the West 3rd Street – Mahoning to Jefferson sewer connections.

4.2 **NARRATIVE DESCRIPTIONS OF RAW MATERIAL, PRODUCT, AND WASTE MATERIAL HANDLING PRACTICES**

The production process consists of grinding down recycled plate glass to small glass grains which are introduced into a furnace where they are rounded or spherodized to form glass beads.

The inert and non-hazardous plate glass is stored in piles in the northern portion of the plant property away from the storm sewers. This is the only exposed raw material or product stored on the site. There are no contaminants present in the glass cullet piles except for ground glass particles. Thus, broken glass is the only contaminant that could enter the storm sewers from the cullet piles during a run-off event.

All production processes are located within the plant building. There is one floor drain located inside of the building production area, but it has been sealed from use. Particulate air emission collection devices are located on the plant roof on top of where the furnaces are located inside the building. Any glass beads that fall onto the roof or the adjacent ground from this collection devices are cleaned up immediately.

The finished product glass beads are packaged in multiple ply paper bags which are stacked on wooden pallets and wrapped with plastic shrink wrap. Glass beads are also stored in bulk sacks. All finished product storage is conducted in the plant warehouse. There are no floor drains located in the warehouse. The loading dock is located adjacent to the warehouse. Trucks back down the paved driveway to the loading dock where the finished product is loaded onto the trucks.

Coating chemicals and lubricants are stored in 55 gallon drums and 1 or 5 gallon containers on The concrete floor inside the warehouse. Flammable chemicals are stored in Flammable Storage Cabinets. Waste oil is stored in 55 gallon drums in the same area. Very small quantities of waste oil are generated in the plant. All chemicals are delivered to the plant via the loading dock. All drums are inspected for leakage before they are unloaded onto the concrete dock. Any spillage from leaks is cleaned up immediately.

All plant waste materials are stored in a roll-off container, which is located in the plant yard (west of the building). The plant waste materials consist of construction debris, cardboard and paper waste, and small amounts of glass dust floor sweepings. This waste is eventually disposed of in a sanitary landfill. There is no potential of stormwater contamination from this waste storage.

There are no above or below ground liquid storage tanks at the plant. All truck activity in and out of the plant is conducted on paved roads. No vehicle or equipment maintenance activities are conducted in the plant yard.

Plant air emissions are covered under Cleveland APC and Ohio EPA permits. Routine inspections and preventative maintenance activities are conducted on all emission control devices.

Material Safety Data Sheets are on hand for all chemicals used at the plant and Hazardous Communication Training is conducted for all employees. There is no Clean Water Act Section 313 Water Priority Chemicals used at the plant.

4.3 STORMWATER DISCHARGE OUTFALL DESCRIPTIONS

There are two (2) stormwater drains, located on the plant property. Both flow into the City of Cleveland sanitary sewer system, which ultimately discharges into the Cuyahoga River. Sheet flow drains most of the property, flowing onto West 3rd Street, and eventually into street storm drains.

OUTFALLS 001 & 002

These drains are located adjacent to the loading dock. The drains are on the bottom of a depression, at the warehouse dock bays, which collects water drainage from the northwest portion of the plant yard.

SHEET DRAINAGE

The plant property is sloped downward (slightly) toward West 3rd Street, which borders the property on the east side. Drainage from roof gutters, the cullet pile, the truck turning areas, and employee parking are all part of this sheet flow.

4.4 PERCENTAGE OF PLANT PROPERTY DRAINAGE AREA THAT IS IMPERVIOUS

Approximately 95% of the plant property drainage area is impervious.

4.5 SIGNIFICANT SPILLS DURING 2005-2008

There are no significant spills during this three year time period. Minor spills are logged and described on forms attached to this plan

4.6 POTENTIAL POLLUTANTS WHICH CAN BE EXPECTED TO BE PRESENT IN THE STORMWATER DISCHARGE

Potential pollutants include glass and small spills of oil from trucks and cars.

4.7 CERTIFICATION THAT THE STORMWATER OUTFALLS HAVE BEEN EVALUATED FOR THE PRESENCE OF NON-STORMWATER DISCHARGES

Based on in-house studies, it has been determined that there is no potential for stormwater spilled contamination from any liquid raw materials or waste materials. Potential for presence of oil or solid materials (inert glass beads or glass particles) has been minimized and controlled through a best management practices plan. All indoor drains have been sealed from use.

5.0 BEST MANAGEMENT PRACTICES PLAN

NARRATIVE DESCRIPTION OF MATERIAL MANAGEMENT PRACTICES EMPLOYED TO CONTROL OR MINIMIZE THE EXPOSURE OF SIGNIFICANT MATERIALS TO STORMWATER

5.1 COATING CHEMICAL DELIVERY AND STORAGE

55 gallon drums containing glycerin, silicone, and other coating chemicals are delivered at the loading dock/receiving dock. At the time of delivery, each drum is inspected for holes, structural damage or any other signs of leakage. If there is leakage, the drum is not accepted and is sent back to the supplier. Any leakage onto the loading dock is immediately cleaned up using rags and sorbent material.

The drums that are accepted are stored inside the plant building on a plastic secondary containment tub on a concrete floor inside the warehouse. Any spillage that occurs is cleaned up immediately or contained in the plastic tub.

One and 5 gallon flammable chemicals are stored in Flammable Chemical Storage Cabinets.

5.2 WASTE OIL STORAGE

Waste oil generated from plant operations is poured into a 55 gallon drum, which is stored on a plastic secondary containment tub on concrete floor inside the warehouse. The waste oil that is collected is periodically disposed of by a licensed and bonded vendor. Any

spillage of oil is cleaned up immediately or contained in the plastic tub. Very small quantities of waste oil are generated by the plant.

5.3 PROPANE GAS CYLINDER STORAGE

Full and empty propane gas cylinders are stored in locked storage bins outside of the plant building. In the unlikely event that a rupture occurs, the propane gas will readily evaporate.

5.4 GLASS BEAD DUST & GLASS PARTICLES

Glass bead and ground glass dust is inert, non-toxic and non-hazardous. Any exposure of glass dust to Outfalls 001 & 002 will be from spillage onto the plant access to the warehouse docks from dust collection devices located on the plant roof and on the baghouse support structure, or carried outside via towmotor traffic through west bay door.

Any spills of oil from leaks on trucks or cars will be cleaned up immediately. {Describe how} warehouse docks from dust collection devices located on the plant roof and on the baghouse support structure.

Exposure of glass dust to sheet run-off will be from plate glass delivery trucks, or via towmotor traffic through north bay doors.

As part of the plant housekeeping program, areas surrounding Outfalls 001 and 002 are inspected daily and swept/cleaned twice weekly (or more if necessary). Any accumulated glass on the road by the storm drains is cleaned up immediately.

5.5 INSPECTION SCHEDULES OF STORMWATER CONVEYANCES AND CONTROLS

A semi-annual visual inspection will be conducted by a member of the Pollution Prevention Team or their designee. The inspections will occur once in the fall (September-November) and once during the spring (April-June). The inspection items will include the following:

- Absence of glass dust, oil sheens and other debris around the 2 storm drains and on paved areas outdoors.
- All inspections will be documented in a log book per Section 5.2.

5.6 PREVENTIVE MAINTENANCE AND GOOD HOUSEKEEPING

Preventive maintenance shall be conducted on the particulate control devices on a regular basis. All preventive maintenance activities will be documented in a log book per Section 5.2.

Good housekeeping is practiced in all plant production areas and the waste oil and chemical storage areas. Particular emphasis is place on immediate cleanup of any waste oil or coating chemical spill, and glass particles near storm sewers.

5.7 EMPLOYEE TRAINING

Annual employee training will be conducted on the following topics:

- Spill prevention measures and cleanup plans
- Stormwater Pollution Prevention Plan requirements and action items

- Instructions on securing drums and containers and frequently checking for leaks and spills
- Preventive maintenance activities
- All employee training will be documented.

6.0 MONITORING AND REPORTING PROCEDURES

For any spills up to a sheen, call the Ohio EPA at 1-800-282-9378 within 30 minutes of the spill. Where a release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR 302 occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of either 40 CFR 302 as soon as you have knowledge of the discharge.

6.1 ANNUAL REVIEW

The Stormwater Pollution Prevention and Best Management Practices Plan will be reviewed and updated on an annual basis. Implementation of the Plan will include documentation of all inspection and maintenance activities outlined in the Plan. Such documentation will be kept on site for a period of five years.

6.2 FACILITY INSPECTIONS AND MAINTENANCE ACTIVITIES DOCUMENTATION

The semi-annual visual inspections and any subsequent maintenance activities performed will be documented in a log book. Items to be recorded include the date and time of inspection, individual(s) making the inspection and a narrative description of the facility's stormwater control system, plant equipment and systems. The Inspection Log sheet will be completed and incorporated into the Stormwater Pollution Prevention Plan.

6.3 STORMWATER DISCHARGE VISUAL MONITORING

Due to the physical configuration of the stormwater drains, visual stormwater discharge monitoring is not possible. Analytical sampling is not required since there are no vehicle maintenance activities conducted on the plant grounds.

6.4 ATTACHMENTS

STORMWATER INSPECTION FORM - # S1-EHS

REVISION HISTORY

SECTION	DATE	REVISION
Document	10/27/07	Rev (H) previous on file
Document	2/27/09	Rev I Update. Significant spills in three yr time period, update tele B. Jenkins

POTTERS INDUSTRIES
CLEVELAND, OHIO PLANT

STORMWATER SYSTEM INSPECTION AND MAINTENANCE ACTIVITY LOG

Date of Inspection _____

Time of Inspection _____

Person Making Inspection _____

INSPECTION ITEMS

Is there presence of oil spillage or sheens around Storm water Drain 001 or 002 by loading dock?

___ Yes ___ No

Is Storm water Drains 001 or 002 clogged with debris?

___ Yes ___ No

Is the plant perimeter clear of litter?

___ Yes ___ No

Are the sidewalks clean and swept ?

___ Yes ___ No

Narrative description of general appearance of storm water drains and any preventive or corrective maintenance activities conducted on air pollution control devices:
