



January 9, 2024

WinCup, Inc.
Attn: Court Jones
150 Fourth Ave.
Mt Sterling, Ohio 43143
courtjones@wincup.com

**Re: WinCup
Notice of Violation (NOV)
NOV
NPDES
Madison County
4GR00840*BG**

Transmitted Electronically

Subject: Notice of Violation

Dear Mr. Jones:

On December 10, 2024, Ohio EPA, Division of Surface Water (DSW) conducted an inspection of the WinCup facility located at 150 Fourth Avenue in Mt. Sterling, Madison County. The purpose of the inspection was to evaluate your facility's compliance under the National Pollutant Discharge Elimination System (NPDES) general permit for stormwater discharges associated with industrial activities, commonly referred to as the multi-sector general permit (MSGP), OHR000007, which became effective on June 1, 2022, and expires on May 31, 2027. During the inspection Ohio EPA met with Chris Netral, Safety and Quality Supervisor. The inspection included a review of records and a walk through of the facility grounds.

WinCup has an industrial facility that occupies an approximate 5.78-acre area. Operations are primarily associated the production of plastic lids for various cup sizes for commercial business use. Plastic pellets are offloaded from trucks and railcars into four silos located on the southeast corner of the main building. These are connected to the interior of the plant via a series of pipes on the roof. The primary standard industrial classification (SIC) code for this activity is 3089 – Plastic Products, NEC and falls under MSGP sector Y (rubber, miscellaneous plastic products, and miscellaneous manufacturing industries), subsector Y2 (miscellaneous plastic products).

Violations

Ohio EPA DSW observed the following violations of Ohio's environmental laws, regulations, and MSGP terms and conditions. It is recommended you promptly address these violations as per the below-provided requested actions and within the timeline stated under the conclusion to this letter.

1. **Violation Description:** Failure to implement control measures and minimize the discharge of pollutants in your stormwater. *This is a violation of Ohio Revised Code (ORC) section 6111.07(A), Ohio Administrative Code (OAC) rule 3745-1-04, and Parts 2 and 8.Y.2.2 of your permit.*

Additional Information: Ohio EPA staff observed plastic pellets and regrind material throughout the facility grounds. Plastic pellet waste was around the silos, in the parking lot, on the lawn and other grassed areas, and along the railroad. Plastic material was along the banks of and within the bed of the swale that discharges to a surface water of the state. At the time of the inspection it was raining, and plastic pellets were observed floating in the swale's flow.

Additional Information: A sheen was evident in the stormwater flow within the swale that discharges to a surface water of the state. During the inspection a sheen was observed flowing into a stormwater catch basin at the loading docks on the west side of the building.

Additional Information: There is drum situated over the concrete portion of the swale along the south side of the building. The drum is used to capture particulate matter from an air filtration system. An oily substance was seen on the drum.

Requested Action: Please implement corrective action procedures as described in Part 3 of the MSGP to thoroughly clean all areas where spills have occurred and where control measures are no longer functional. Document the following in a corrective action report and submit the report to Ohio EPA:

- Identification of the condition triggering the need for corrective action.
- Description of the problem identified.
- Date the problem was identified.
- Summary of corrective action(s) taken to minimize pollutants in the stormwater discharge.
- Notice of whether stormwater pollution prevention plan (SWPPP) modifications are necessary as a result of the corrective action. If it is determined that SWPPP modifications are necessary, then also complete a SWPPP modification log.
- Date the corrective action was initiated.
- Date correction action was completed or expected to be completed.

2. **Violation Description:** Failure to correctly identify "stormwater pollution prevention team" members in the SWPPP. *This is a violation of ORC 6111.07(A) and Part 5.1.1 of your permit.*

Additional Information: The SWPPP incorrectly identifies the previous plant manager as one of the contacts on the pollution prevention team.

Requested Action: Please update SWPPP to correctly identify who the stormwater pollution prevention team members are. Please note that team members can be identified by title rather than name.

- 3. Violation Description:** Failure to implement sector specific control measures/best management practices (BMPs). *This is a violation of ORC 6111.07(A) and Part 2.2.1.8 of your permit.*

Additional Information: Sector specific control measures that apply to this facility are requirements to minimize the discharge of plastic resin pellets in your stormwater discharges. Control measures to be considered for implementation (or their equivalents) include minimizing spills, cleaning up of spills promptly and thoroughly, sweeping thoroughly, pellet capturing, employee education, and disposal precautions. Plastic resin pellets were observed throughout the facility grounds but were more prominent in the off-loading areas near the silos and rail line directly adjacent to the stormwater discharge point. Plastic resin pellets were also observed in the stormwater discharge at the time of the inspection.

Requested Action: Please provide a plan that discusses the control measures/BMPs that have been developed or will be developed, how they will be implemented, and how assurance of implementation will occur. Please modify the SWPPP so that it addresses sector specific requirements. Please provide a copy of the SWPPP modification log showing the changes that have been made to the SWPPP over the past three years.

- 4. Violation Description:** Failure to conduct routine facility inspections. *This is a violation of ORC 6111.07(A) and Part 4.1 of your permit.*

Additional Information: Routine facility inspections have not been completed since May 19, 2023.

Requested Action: Because of recurring compliance issues with this facility, Ohio EPA is elevating the frequency of routine facility inspections to monthly. Please acknowledge the requirement to conduct monthly inspections and modify the inspection schedule in the SWPPP. Furthermore, in accordance with your spill response procedures, please develop a plan to conduct and document spot inspections after loading/unloading events, and at the end of day for any spilled plastic pellets. Please submit reports for all inspections and corrective action logs completed in January, February, and March 2025 (one of which should be during a rain event, if possible).

- 5. Violation Description:** Failure to perform quarterly visual assessments (QVAs). *This is a violation of ORC 6111.07(A) and Part 4.2 of your permit.*

Additional Information: A QVA has not been completed since March 10, 2023. Prior to that the last QVA occurred on March 15, 2022. At least one QVA must represent a snow melt event, if possible.

Requested Action: Please submit a plan to Ohio EPA that describes how the facility will ensure that QVAs are completed as required by the permit.

- 6. Violation Description:** Failure to provide annual training to the pollution prevention team as well as all employees who work in areas where industrial materials or activities are exposed to stormwater or who are responsible for implementing activities necessary to meet MSGP conditions. *This is a violation of ORC 6111.07(A) and Part 2.1.2.9 of your permit.*

Additional Information: Employee training as required under MSGP Part 2.1.2.9 has not occurred since May 25, 2023.

Requested Action: Please provide a plan to Ohio EPA that details how employee training will occur as it pertains to industrial stormwater permit compliance. As part of the plan, please identify which existing employees will receive training, when and how new employees will be trained, and what topics will be covered in the training.

7. **Violation Description:** Failure to complete an annual report. *This is a violation of ORC 6111.07(A) and Part 7.2 of your permit.*

Additional Information: The annual report form in Appendix I of the MSGP has not been completed since May 22, 2023.

Requested Action: Please complete and submit an annual report to Ohio EPA and describe how you will ensure that annual reports are completed moving forward.

8. **Violation Description:** Failure to eliminate non-stormwater discharges not authorized by a NPDES permit. *This is a violation of ORC 6111.07(A) and Part 2.1.2.10 of your permit.*

Additional Information: During the inspection, Ohio EPA observed water discharging from a pipe into the concrete swale located in the southwest corner of the building. The water was not flowing continuously, but rather was discharging in spurts indicating that it may not be a stormwater discharge.

Requested Action: Please investigate the source of this discharge and report the results to Ohio EPA. Based on the results of the investigation, Ohio EPA will determine if additional action needs to occur.

Conclusion

Within 30 days of receipt of this letter, please provide documentation to Ohio EPA DSW of the actions taken and/or will be taken to resolve the violations cited above. Documentation of steps taken to resolve these violations includes but is not limited to the following: written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to wesley.sluga@epa.ohio.gov. If circumstances delay resolution of violations, please contact Ohio EPA DSW to discuss the situation and propose an alternative schedule to resolve the violations in a timely manner.

Failure to comply with Chapter 6111 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Chapter 6111.09 of the Ohio Revised Code.

This is the third time within two years that Ohio EPA has documented compliance issues with this facility. While the facility has been responsive to addressing concerns when brought to their attention, it has not followed through to ensure continued compliance without Ohio EPA's intervention. Therefore, if compliance does not improve, Ohio EPA may need to consider revoking coverage under the general permit and instead cover the stormwater discharge under an individual NPDES permit.

If you have any questions, please contact me at rahel.babb@epa.ohio.gov or via phone at (614) 728-3855.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rahel S. Babb', with a long horizontal line extending to the right.

Rahel S. Babb
Division of Surface Water

ec: Jason Fyffe, Ohio EPA, DSW
Wesley Sluga, Ohio EPA DSW
Chloe Welch, Ohio EPA, DSW
Scott Sheerin, Ohio EPA, DSW
Chris Netral, WinCup, Inc.

Industrial Stormwater Inspection Checklist

Facility Name: WinCup, Inc.				
Facility Address: 150 Fourth Ave., Mount Sterling, Madison County				
Permit Number: 4GR00840*BG		Permit Expired? No		
SIC Code(s): 3089		Sector: Y (Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries) Subsector: Y2 (Miscellaneous Plastic Products)		
Inspection Date: 12/10/2024		Start Time: 12:30 PM	End Time: 2:30 PM	
Ohio EPA Inspector(s): Rahel Babb				
Facility Representative(s): Chris Netral				
<p>Description: WinCup, Inc. is an industrial production facility that occupies an approximate 5.78-acre area. Operations are associated the production of plastic lids for various cup sizes and primarily for commercial business use. Plastic pellets are offloaded from trucks and railcars into four silos located on the southeast corner of the main building. These silos are connected to the interior of the plant via a series of pipes on the roof. The primary standard industrial classification (SIC) Code for this activity is 3089 – Plastic Products, NEC and falls under sector Y (rubber, miscellaneous plastic products, and miscellaneous manufacturing industries), subsector Y2 (miscellaneous plastic products) of the MSGP. Benchmark monitoring is not a requirement of this subsector.</p>				
<p>Documents: (the only document available at the time of the inspection was the SWPPP)</p> <p> <input checked="" type="checkbox"/> SWPPP <input type="checkbox"/> SWPPP modification log <input type="checkbox"/> Routine Facility Inspections <input type="checkbox"/> Quarterly Visual Inspections <input type="checkbox"/> Corrective Action Log <input type="checkbox"/> Annual report <input type="checkbox"/> Spill Response Plan <input type="checkbox"/> Employee training logs <input type="checkbox"/> Non-stormwater discharge evaluation </p>				
A. Storm Water Pollution Prevention Plan (SWPPP)		Yes	No	NA
1.	Was a SWPPP readily available during the site visit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Was it properly signed and dated since the last update?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the SWPPP include a site map?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	If yes, does the map include all relevant information? (see part E. MSGP site map checklist)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Does the SWPPP include schedules and procedures for routine facility inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Does the SWPPP include schedules and procedures for the quarterly visual assessment of storm water discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Industrial Stormwater Inspection Checklist (continued)

5.	If benchmark monitoring is required, does the SWPPP describe how and when that will be done?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Are sector-specific requirements included (facility specific) in the SWPPP?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Was employee training conducted at least annually and does the SWPPP include training records with all the required information? (Dates, attendees, training topics). Employee training has not occurred annually as required. The last stormwater training event occurred on 5/5/23.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Does the SWPPP include the names or positions of the current pollution prevention team with each member's responsibilities? The SWPPP has not been updated to include the correct members of the stormwater pollution prevention team, which currently includes the previous general manager who is no longer at the facility.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.	Does the SWPPP include documentation that the facility has been evaluated for non-storm water discharges? (Date of evaluation, method used, outfalls/drainage points observed, observations, any actions taken like floor drain sealed). *Note: Evaluation required once (initially) and after any facility operations/plumbing renovations that could create a new non-storm water discharge.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Does the SWPPP include Spill Prevention and Response Procedures? (SPCC may be referenced).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. MSGP Site Map Checklist		Yes	No	NA
1.	The size of the property in acres.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	The location and extent of significant structures and impervious surfaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Directions of stormwater flow (use arrows).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Locations of all existing structural control measures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Locations of all receiving waters in the immediate vicinity of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Locations of all stormwater conveyances including ditches, pipes, and swales.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Locations of potential pollutant sources identified under Part 5.1.3.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Locations where significant spills or leaks identified under Part 5.1.3.3 have occurred. Significant spills have occurred on multiple occasions in the silo and rail unloading areas; however, spills that occurred in these areas were not identified on the map.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.	Locations of all stormwater monitoring points.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 001, No. 002, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Industrial Stormwater Inspection Checklist (continued)

	a. Outlets treated as “substantially identical” under Parts 4.2.3, 5.1.5.2, and 6.1.1.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b. An approximate outline of the areas draining to each outfall.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Municipal separate storm sewer systems (MS4s) and where site stormwater discharges to them.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Locations and descriptions of all non-stormwater discharges identified under Part 2.1.2.10.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Locations of the following activities where such activities are exposed to precipitation:			
	a. Fueling stations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b. Vehicle and equipment maintenance and/or cleaning areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c. Loading/unloading areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d. Locations used for the treatment, storage, or disposal of wastes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e. Liquid storage tanks; processing and storage areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	f. Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	g. Transfer areas for substances in bulk.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	h. Machinery.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C. Records Review		Yes	No	NA
1.	Routine Facility Inspections. Were three years of inspection records available? The last routine facility inspection was completed on 6/20/23. Routine facility inspections only occurred during three quarters in 2022 and 2021, and only twice in 2023.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Routine inspections performed in the last 12 months; do the inspection records include the following: The inspection forms contain the below-stated information; however all of these responses were marked “NA” since no routine facility inspections were completed in the past 12 months.			
	Date and time.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Name(s) and signature(s) of inspector(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Weather information.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Description of any discharges occurring at the time of the inspection.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Industrial Stormwater Inspection Checklist (continued)

	Previously unidentified discharges of pollutants from the site.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Control measures needing maintenance or repairs.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Failed control measures that need replacement.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Incidents of noncompliance observed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Additional sector-specific control measures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Was at least one routine facility inspection per year completed during a rain event?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Quarterly visual inspections (QVI) of discharge. Were three years of QVI Records available for each applicable outfall?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	For QVIs performed in the last 12 months (total for all applicable outfalls), do the inspection records include the following: QVA forms contain the below-stated information; however all of these responses were marked “NA” since no QVAs were completed in the past 12 months.			
	Sample locations.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Sample collection date and time.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Visual assessment date and time for each sample.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Sampler name and signature.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Nature of the discharge (i.e., runoff or snowmelt).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Visual observations (color, odor, clarity, floating and/or settled solids, foam, oil sheen, other pollutants.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Probable sources of any observed stormwater contamination.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If applicable, why it was not possible to take samples within the first 30 minutes and/or from a 72 hour (3 day) storm interval.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Were samples collected in a clean, clear container and examined in a well-lit area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Were the samples collected within the first 30-minutes of an actual discharge from a storm event?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If no, was documentation provided as to why it was not possible to take the samples within the first 30-minutes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Was at least one QVA representative of a snow melt event?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Industrial Stormwater Inspection Checklist (continued)

9.	Annual Reports. Were Annual Reports available for each year of permit coverage? The last annual report was dated for 5/22/23 and addressed 2022 activities. There was no annual report completed for 2023.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.	Corrective Actions. Was corrective action documentation available?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11.	Employee Training. Were employee training logs available?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Site Observations		Yes	No	NA
1.	Number of outfalls on site:	1		
	Number of outfalls inspected:	1		
2.	Are any outfalls being treated as substantially identical: If so, is this correct?	<input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
3.	Did any outfalls or storm drain inlets observed show evidence of pollutants discharged in the storm water? If yes, describe: Plastic pellets and a sheen were observed in the discharge.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Control Measures/BMPs. Were there any observed compliance issues with the following BMPs?			
5.	Minimizing exposure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Good housekeeping? Waste, garbage, and floatable debris?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Maintenance of BMPs and equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Spill prevention and response procedures (spill kits)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Erosion and sediment controls?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.	Management of runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Salt storage?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Sector-specific control measures/BMPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.	Non-storm water discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	Dust control and off-site tracking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments				
<ul style="list-style-type: none"> • Has not been completing a SWPPP amendment log. • Has not been documenting spills and corrective actions taken. 				

Industrial Stormwater Inspection Checklist (continued)

- **Control measures are not working to minimize pollutants in the stormwater discharge. Control measures include promptly cleaning spills, minimizing exposure, and a structural control at discharge point. Plastic resin pellets were evident throughout the facility grounds and appeared to have been present for a while. The drum used to capture particulates from the air filtration system was in very poor condition and was not adequately protected to prevent oily substances on it from depositing in the drainage channel that it is situated over. Also, an oil/fuel spill in the loading dock area was observed in stormwater flowing into a catch basin. Lastly, the structural control at the discharge point had completely deteriorated. There was no record as to when the control had been replaced.**
- **Possible non-stormwater discharge from pipe that discharges into swale at southwest corner of building. Observed a sporadic discharge here (i.e., was not a consistent flow). Recommend that the facility investigate the discharge source.**

Industrial Stormwater Inspection Checklist (continued)



Figure 1. Swale leading to discharge point.



Figure 2. Concrete swale where material unloading occurs.

Industrial Stormwater Inspection Checklist (continued)



Figure 3. Air filtration particulate collection drum.



Figure 4. Sheen discharge into storm drain located in loading bay on west side of the facility.

Industrial Stormwater Inspection Checklist (continued)



Figure 5. Still from a video. Image shows water flowing from a pipe located in the southwest corner of the facility building. Discharge was not continuous and was occurring in spurts indicating this may be a non-stormwater discharge.