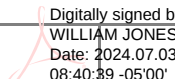
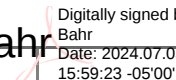


INSPECTION REPORT

Inspection Entry Date/Time	June 6, 2024, 10:00 a.m. (EST)	Announced: No	
Inspection Exit Date/Time	June 6, 2024, 01:20 p.m. (EST)	Access: Granted by City of Toledo	
Weather	Dry and Sunny. It rained on June 5 th .		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit program		
Type of Inspection	Industrial Stormwater Inspection (ISI)		
Permittee Name			
Facility or Site Name	Omni Polymers		
Facility/Site Physical Address	1925 Nebraska		
City, State, Zip Code	Toledo, Ohio 43607		
County/Borough/Parish	Lucas		
Facility GPS Coordinates			
Mailing Address (If different)	Omni Polymers Intl Corp, c/o Joe LaRosa, 149 Braebrook Drive, Whitby Ontario, Canada L1R 0M9 Joe@ueservice.ca ; joe@opolyusa.com		
FRS ID			
Permit Number(s) (If Applicable)/identifier	OHU000054		
SIC and/or NAICS	Possibly 5093		
Lead Inspector:			
William Jones	 Digitally signed by WILLIAM JONES Date: 2024.07.03 08:40:39 -05'00'		
	EPA REGION 5	Jones.William@epa.gov	(312) 886-6058
Supervisor Review:			
Ryan Bahr	 Digitally signed by Ryan Bahr Date: 2024.07.03 15:59:23 -05'00'		
	EPA REGION 5	Bahr.Ryan@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 5 Lead Inspector, William Jones, arrived at Omni Polymers (the “Site” or “Facility”), located at 1925 Nebraska Ave, Toledo, Ohio 43607, at 10:00 a.m. (Eastern time) on June 6, 2024, for an unannounced inspection. EPA Region 5 Lead Inspector wore his credentials. The City of Toledo provided access to the facility’s

site. There were no employees of Omni Polymers present. This Region 5 EPA inspection to investigate compliance is authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by a tenant of Omni Polymers and direct observations made by EPA Region 5 inspectors. In addition, information gathered prior to or after the Inspection from a review of US Environmental Protection Agency (EPA), state, and/or public records may be included in this report.

We were not able to go through the building to inspect all of it for interior drains or pretreatment requirements due to safety concerns. There was a strong chemical odor present near the building that was coming from the inside of the building. The fire department cautioned against entering the building.

Attendees

Organization	Attendee Name	Title
EPA REGION 5	William Jones	Lead Inspector
EPA Region 5	Andi Hodaj	Environmental Engineer
Ohio EPA	Brittany Brockmann	Environmental Specialist II
City of Toledo	Michelle Hughes	Chief of Emergency Response
City of Toledo	Regina Collins	Chief, Water Resources
City of Toledo	Christian Jackowski	Senior Environmental Specialist
City of Toledo	Lashana Weeks	
City of Toledo	Timothy Clapp	Deputy Chief
City of Toledo	Ryan Grant	Fire Inspector
City of Toledo	Anthony Bernal	Fire Safety Inspector
Tenant	Bill Roth	Tenant/maintenance

Facility/Site Description

EPA REGION 5 lead inspector confirmed the following facility information:

The facility does not have an industrial storm water permit. The facility appears to be recycling plastic, and pressure-testing containers for reuse.

Facility/Site Information**Location(s)**

Location/Area/Sub-area	Description
East side of Main building by Bay door	View inside building
Green trash container and trailer	Trash and storm catch basin
Manhole #1	Manhole by south fence line

Manhole #2	Manhole along south side of building
Container area	Container/small shed area on south side of building
Large storage building on SE side of main building	Area where alcohol is stored
Bay door on south center side of building	View inside building and area just outside of building
Storm sewer manhole Northwest of main building	View inside manhole
Inside storm sewer manhole south of Omni Polymers	Manhole is located along North Fearing Blvd
Outfall into Swan Creek	This is the former outfall for CSO #124

SECTION II – OBSERVATIONS

Location: East side of Main Building by Bay Door		
Observation #: WJ1-OB-001	Date: June 6, 2024	Weather: Sunny
Intermediate Bulk Storage Containers (IBC) can be seen inside the building through the bay door. A trench drain is at the entrance to the door.		
Photos 1 to 2		

Location: Green Trash Container and Trailer		
Observation #: WJ1-OB-002	Date: June 6, 2024	Weather: Sunny
The trash can is overflowing and trash bags are on the ground. There is a storm drain inlet nearby under a trailer. On top of the trailer is a fuel container with liquid inside of it. There is staining on the ground below where the fuel container is.		
Photos 3 to 6		

Location: Manhole #1		
Observation #: WJ1-OB-003	Date: June 6, 2024	Weather: Sunny
Inside a manhole located in the southern end of the site near the fence there are multiple pipes connecting into the manhole. One white pipe and three darker pipes connect into the manhole here. The white pipe appears to be coming from a North-easterly direction. The darker pipes appear to go in a South, North and West Direction.		
Photo 7		

Location: Manhole #2

Observation #: WJ1-OB-004	Date: June 6, 2024	Weather: Sunny
The inside of manhole #2 located on the south-east side of the building. Liquid appears to have filled it to the top of the manhole with little bits of what appears to be floating plastic on top of the liquid. A rope and what appears to be a black electrical cord stretch down into the liquid in the manhole.		
Photo 8		

Location: Container area		
Observation #: WJ1-OB-005	Date: June 6, 2024	Weather: Sunny
Photograph 9. Plastic storage container with drain at bottom over storm drain inlet. This is just south of the building near the trash compactor. Photographs 10-11 show containers outside the facility labeled sulfuric acid. It is unknown if the containers are empty. Photographs 11-12 show a small storage building. In front of the building is an inlet to a manhole that water can flow through. Photograph 12 shows Intermediate IBC stored in the building shown in photograph 11. The white IBCs have liquid in them. The blue tank appears to be a fuel tank. The building does not have a berm to contain any spills. Photograph 13 shows more IBC. Photographs 14-16 show a storage barn with IBCs inside. Photographs 17-18 show an area near the storage barn where small pieces of plastic can be seen on the ground. Photographs 19-22 show an area where alcohol is stored. Photographs 23-26 and 29-30 show the inside of the facility by the bay door that faces south, on the south end of the facility. Two interior drains are in the area shown in photographs 24 and 30. Mr. Bill Roth stated that the water level rises in the two drains during a rain, and that he believes they are connected to the manhole in photograph 8. Photographs 26, 27 and 28 show a storm drain catch basin just outside of the south bay door. Bits of plastic can be seen in the catch basin.		
Photos 9 to 30		

Location: Storm sewer manhole to the northwest of the main building		
Observation #: WJ1-OB-006	Date: June 6, 2024	Weather: Sunny
Storm water manhole to the Northwest of the main building along Nebraska Avenue.		
Photos 31 to 32		

Location: Inside storm sewer manhole south of Omni Polymers building**Observation #:** WJ1-OB-007**Date:** June 6, 2024**Weather:** Sunny

Water was flowing through the storm sewer.

Photos 33 to 34**Location:** Outfall into Swan Creek**Observation #:** WJ1-OB-008**Date:** June 6, 2024**Weather:** Sunny

Photographs 35-37 show the outfall and a piece of plastic near the outfall.

Photos 35 to 37

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Facility Map**AOC:** No**Ref #:** WJ1-RR-001**Reviewed By:** William Jones**Reviewed Date:** November 2,
2023

Facility staff were not available to provide records.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted by USEPA using approved test methods.

SECTION V - AREAS OF CONCERN

Clean Water Act Section 301 (a) provides that “Except as in compliance with this section and sections...402 of this Act, the discharge of any pollutant by any person shall be unlawful.” The facility does not have a storm water discharge permit.

The facility has pollutants present outside of the building on the ground and in storm water catch basins. The facility has a catch basin on the south end of its site that has a pipe connected into it that leads to the south, in the direction of Swan Creek. Plastic was observed near the storm sewer outfall into Swan Creek.

The facility appears to have interior drains near the south bay door that are tied into the manhole shown in photograph 8.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Lead Inspector was unable to hold a closing conference with the facility due to a facility representative not being on site.

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG (times below are in eastern time)



Photograph 1. View inside Omni Polymers building			IMGP0033.JPG
June 6, 2024/10:27 a.m.		No PII	Photographer: William Jones
East Side of Omni Polymers building looking west into the building showing a storage area			
Camera Direction: Westerly			



Photograph 2. View inside of Omni Polymers Building. Same as photo 1.			IMGP0034.JPG
June 6, 2024/10:27 a.m.		No PII	Photographer: William Jones
East Side of Omni Polymers building looking west into the building showing a storage area			
Camera Direction: Westerly			



Photograph 3. Trash container with overflowing trash			IMGP0035.JPG
June 6, 2024/10:46 a.m.		No PII	Photographer: William Jones
South-East side of site			
Camera Direction: Southerly			



Photograph 4. Trash container with overflowing trash			IMGP0036.JPG
June 6, 2024/10:46 a.m.		No PII	Photographer: William Jones
South-east side of site. This container is also shown in photograph 3.			
Camera Direction: South-west			



Photo 5. Trailer with storm drain inlet under wheel.			IMGP0037.JPG
June 6, 2024/10:48 a.m.		No PII	Photographer: William Jones
A gas can with liquid inside of it is on the trailer. Staining can be seen on the ground under the front of the trailer. The trailer is also shown in photograph 4.			
Camera Direction: Looking southerly			



Photograph 6. View inside of the manhole lid shown in photograph 5.			IMGP0038.JPG
June 6, 2024/10:48 a.m.		No PII	Photographer: William Jones
The inside of the manhole shows a white pipe on the left leading into the structure. The pipe is brown at the bottom of the white pipe.			
Camera Direction: View looking down			



Photograph 7. Inside manhole #1.			IMGP0039.JPG
June 6, 2024/11:02 a.m.		No PII	Photographer: William Jones
View of the inside of a manhole located in the southern end of the site near the fence line and marked in the attached general sketch as manhole #1, where multiple pipes are connecting into the manhole. One white pipe and three darker pipes connect into the manhole here. The white pipe appears to be coming from a North-easterly direction and has brown material in the bottom of it. The darker pipes appear to go in a South, North and West Direction.			
Camera Direction: View looking down			



Photograph 8. Inside manhole #2			IMGP0040.JPG
June 6, 2024/11:06 a.m.		No PII	Photographer: William Jones
View of the inside of manhole located on the south-east side of the building). Liquid appears to have filled it to the top of the manhole with little bits of what appears to be floating plastic on top of the liquid. A rope and what appears to be a black electrical cord stretch down into the liquid in the manhole.			
Camera Direction: View looking down			



Photograph 9. Plastic storage container with drain at bottom over storm drain inlet. This is just south of the building near the trash compactor.			IMGP0041.JPG
June 6, 2024/11:12 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking southwest			



Photograph 10. Drums stored outside. Two of the drums are marked Sulfuric Acid and the drums in the photo are also marked corrosive.			IMGP0042.JPG
June 6, 2024/11:13 a.m.		No PII	Photographer: William Jones
Near the track compactor just south of the building			
Camera Direction: View looking south-westerly			



Photograph 11. A stack of containers that are also shown in photograph 10.			IMGP0043.JPG
June 6, 2024/11:18 a.m.		No PII	Photographer: William Jones
The containers are next to a small storage building. Shown in front of the building is an inlet to a manhole that water can flow through.			

Camera Direction: View looking south



Photograph 12. Intermediate Bulk Containers (IBC) stored in the building shown in photograph 11. The white IBC have liquid in them. The blue tank appears to be a fuel tank. The building does not have a berm to contain any spills.			IMGP0044.JPG
June 6, 2024/11:28 a.m.		No PII	Photographer: William Jones
Inside the building shown in photograph 11.			[Geographic Coordinates]
Camera Direction: Looking south			



Photograph 13. IBCs stored outside next to the building shown in photograph 11.			IMGP0045.JPG
June 6, 2024/11:28 a.m.		No PII	Photographer: William Jones
South of the main building			
Camera Direction: View looking South-west			



Photograph 14. IBC with dark liquid dried on outside of it. The container is half filled with a dark liquid.			IMGP0046.JPG
June 6, 2024/11:30 a.m.		No PII	Photographer: William Jones
South of main building to the west of the building shown in photograph 11.			
Camera Direction: View looking south-west			



Photograph 15. Building with IBCs inside of it.			IMGP0047JPG
June 6, 2024/11:31 a.m.		No PII	Photographer: William Jones
Building south of the main building. This building is also shown in photograph 14.			

Camera Direction: View looking south



Photograph 16. Close up of IBC shown in phtograph 15. The container contained a dark liquid.			IMGP0048.JPG
June 6, 2024/11:31 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking south			



Photograph 17. Former dumping area southwest of the main building			IMGP0049.JPG
June 6, 2024/11:38 a.m.		No PII	Photographer: William Jones
Also, see photograph 18.			
Camera Direction: View looking south			



Photo 18. Close up of area shown in photograph 17 showing what appears to be bits of plastic among the rocks/dirt			IMGP0050.JPG
June 6, 2024/11:38 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking down			



Photo 19. Inside of the large shed south of the main facility that is used for storing alcohol. This container is also shown in photographs 20 and 21.			IMGP0051.JPG
June 6, 2024/11:42 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking south-east			



Photograph 20. Photo inside of large shed where alcohol is stored			IMGP0052.JPG
June 6, 2024/11:42 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking east			



Photograph 21. View inside of large shed showing container shown in photograph 19.			IMGP0053.JPG
June 6, 2024/11:42 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking south			



Photograph 22. Photo inside of large shed where alcohol is stored			IMGP0054.JPG
June 6, 2024/11:45 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking west			



Photograph 23. View inside of building from Bay door on south side of building looking to the right.			IMGP0055.JPG
June 6, 2024/11:57 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking south-easterly			



Photograph 24. View inside of building from Bay door on south side of building looking straight in.			IMG0056.JPG
June 6, 2024/11:57 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking north			



Photograph 25. View inside of building from Bay door on south side of building looking to the left.			IMGP0057.JPG
June 6, 2024/11:57 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking north-west			



Photograph 26. View inside of building from Bay door on south side of building looking straight into the building. A storm drain inlet is shown in the bottom of the photo that is just outside of the doorway.			IMGP0058.JPG
June 6, 2024/11:57 a.m.		No PII	Photographer: William Jones
This area is also shown in photographs 24 and 28			
Camera Direction: View looking north and down			



Photograph 27. View inside of storm drain inlet shown in photograph 26. Bits of material can be seen in the photos that appear to be bits of plastic based on the shape and lighter color.			IMGP0059.JPG
June 6, 2024/11:58 a.m.		No PII	Photographer: William Jones
Close up of manhole grate shown in photographs 26 and 28.			
Camera Direction: View looking down			



Photograph 28. Close up of storm sewer inlet shown in photographs 26 and 27.			IMGP0060.JPG
June 6, 2024/11:58 a.m.		No PII	Photographer: William Jones
Camera Direction: View looking down			



Photograph 29. View from inside of the bay door of the area shown in photograph 23.			IMGP0061.JPG
June 6, 2024/12:01 p.m.		No PII	Photographer: William Jones
Camera Direction: View looking south-east			



Photograph 30. View from inside of the bay door of the area shown in photograph 23.			IMGP0062.JPG
June 6, 2024/12:02 p.m.		No PII	Photographer: William Jones
An opening into the drain system is in the floor just to the right of the center of the photograph.			
Camera Direction: View looking south-east			



Photograph 31. View inside of storm manhole at the northwest corner of the main building near Nebraska Ave			IMGP0063.JPG
June 6, 2024/12:23 p.m.		No PII	Photographer: William Jones
Camera Direction: View looking down			



Photograph 32. View inside of storm manhole to the Northwest corner of the main building near Nebraska Ave			IMGP0064.JPG
June 6, 2024/12:24 p.m.		No PII	Photographer: William Jones
Camera Direction: View looking down			



Photograph 33. View inside of storm manhole receiving downpipe of storm sewers connected to sound end of Omni Polymers.			IMGP065.JPG
June 6, 2024/ 1:00 p.m.		No PII	Photographer: William Jones
Camera Direction: View looking down			



Photograph 34. Top section of manhole with green paint. The manhole is also shown in photograph 33.			IMGP0066.JPG
June 6, 2024/1:02 p.m.		No PII	Photographer: William Jones
This is located along the north side of North Fearing Blvd south of the Omni Polymers facility between the railroad bridges			
Camera Direction: View looking northerly			



Photograph 35. Storm water outfall into Swan Creek formerly known as CSO 124. A net and absorbent boom is in front of the outfall.			IMGP0067.JPG
June 6, 2024/1:11 p.m.		No PII	Photographer: William Jones
The outfall is near Highland Park and Emery street in Toledo.			



Photograph 36. Storm water outfall into Swan Creek formerly known as CSO 124. This is also shown in photograph 35. A white piece of plastic was observed near the bottom of the photograph.			IMGP0068.JPG
June 6, 2024/1:14 p.m.		No PII	Photographer: William Jones
This outfall is near Highland Park and Emery Street in Toledo.			



Photograph 37. A close up of the white piece of plastic shown in photograph 36.			IMGP0069.JPG
June 6, 2024/1:14 p.m.		No PII	Photographer: William Jones
This plastic is near the outfall shown in photograph 36.			
View looking down			

