



Environmental
Protection Agency

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

Re: Lucas County
Maumee Valley Fabricators
Industrial
Storm Water

September 23, 2011

Mr. Steve Corthell, Director of Operations
Maumee Valley Fabricators, Inc.
4801 Bennett Road,
Toledo, Ohio 43612

Dear Mr. Corthell:

On September 15, 2011, I inspected Maumee Valley Fabricators, Inc. at 4801 Bennett Road, Toledo (photos taken). The purpose of my visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity, Facility ID Number 2GR01585. Mr. Fred Hegfinger, Fabricating Supervisor, and you were present to provide information about the facility. Ms. Haley Haggard, City of Toledo Division of Environmental Services, was also present. As a result of the inspection, I have the following comments:

1. This facility is a custom metal fabricator, which falls in the Standard Industrial Classification (SIC) Group of 35xx, Industrial and Commercial Machinery. Industrial activities with potential exposure of pollutants to storm water include: material loading and unloading activities at loading bay/truck dock in the event of a spill; material transfer and outside storage of scrap metal and metal chips; outside storage of steel stock and equipment; and material transfer into the garbage dumpster.
2. While the current version of the permit has expired, your coverage remains in effect until Ohio EPA issues a new general permit. Ohio EPA is in the process of renewing the general permit, called the Multi-Sector General Permit (MSGP). The draft MSGP may be viewed at:
http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater_draft_GP_oct10.aspx.

Once the general permit is renewed, Ohio EPA will send an application packet to all permittees instructing them on how to renew coverage. You will have 90 days from receipt of these instructions to renew permit coverage. At this time, **I recommend reviewing the MSGP**. Sections 1 through 8 pertain to all facilities. Subpart AB outlines some of the Best Management Practices (BMPs) required for your industry.

Please be aware that the draft Multi-Sector General Permit will require at least quarterly routine documented inspections of all areas of the facility where industrial activities or materials are exposed to storm water and of all storm water control measures used to comply with this permit.

3. There were no storm water discharges at the facility during my inspection. Facility sampling is not required and has not been performed. However, routine monitoring will be required under the MSGP. The Agency is currently revising the frequency of monitoring in the draft permit. Once the permit is issued final, guidance on MSGP monitoring can be found at:
http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf.
4. A Storm Water Pollution Prevention Plan (SWP3) has been developed for the site and was available. The latest version was signed and dated January 23, 2011. The SWP3 did include the Pollution Prevention Team, the material inventory, and a site map. In general, the SWP3 lacked sufficient detail. The responsibilities of each team member as they pertain to the SWP3's implementation were not described. The SWP3 did not mention sediment and erosion controls for the site. During the inspection, I noted that the locations of the scrap metal roll-offs and general refuse bin, located on the north side, were not shown on the site map. The location of the drums and equipment stored on the west side were not shown. The storm sewers, the site's outfall, and loading and unloading areas were not shown. The SWP3 appeared to lack descriptions of specific actions and/or timeframes for Good Housekeeping, Preventative Maintenance, and Spill Prevention and Response. For example, BMPs for Preventative Maintenance did not appear to be mentioned. The SWP3 needs to be more specific as to what the proper disposal method is for wastes. In some cases, the facility is implementing BMPs which are not described in the SWP3, such as the use of sealed roll-offs for scrap storage. *The missing details are a violation of Part IV.D.2.a. of the permit.*
5. A Comprehensive Site Compliance Evaluation was last performed January 20, 2011.

The NPDES permit requires that the SWP3 describe and insure implementation of storm water controls. These controls must address several different components of facility operations that are listed in the permit. Storm water control implementation issues were noted for the following facility operations:

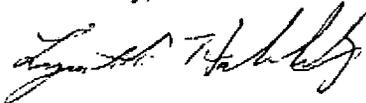
6. Employee Training – The permit requires training programs that shall inform personnel at all levels of the components and goals of the SWP3. Training should address topics such as spill response, good housekeeping and material management practices. The SWP3 shall identify periodic dates for such training. Maumee Valley Fabricators' SWP3 did not appear to discuss training frequency. Employee Training has not been conducted or documented. *This is a violation of Part IV.D.3.e. of the permit.* The draft Multi-Sector General Permit will require at least annual employee training of all employees who work in areas where industrial activities or materials are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g. inspectors, maintenance personnel).

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7. Non-Storm Water Discharge Certification - The permit requires the SWP3 to contain a certification that Maumee Valley Fabricators' storm water discharge has been tested or evaluated for the presence for non-storm water discharges. A description of the results of any test or evaluation, the evaluation criteria or testing method used, the date of the assessment and the onsite drainage points that were observed must be included in the SWP3. While it was reported that there are no illicit discharges, supporting documentation and the certification statement is required. *This lack of information is a violation of Part IV.D.3. g. of the permit.* A floor drain was present in the manufacturing area of the building. I recommend performing a dye test to verify that the drain is connected to the sanitary sewer.

Within 30 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the above issues. Your response should include the dates, either actual or proposed, for the completion of the actions. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Section

/cs

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