



Environmental
Protection Agency

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

Re: Lucas County
Toledo Molding & Die, Inc.
Industrial
Storm Water

September 27, 2011

Mr. Brian Kliesch
Environmental Health & Safety
Toledo Molding & Die, Inc.
1429 Coining
Toledo, Ohio 43612

Dear Mr. Kliesch:

On September 15, 2011, I inspected two of Toledo Molding & Die's facilities: 1429 Coining Drive (Facility ID No. 2GR00458) and 4 East Laskey (Facility ID No. 2GR00171), Toledo (photos taken). The purpose of my visit was to evaluate compliance of the sites with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity. Mr. John McIntee, Corporate Quality Manager; Julian (Joe) Pirrone, Plant Manager (only present for the Laskey Road inspection); and you were present to provide information about the facilities. Ms. Regina Collins, City of Toledo Division of Environmental Services, was also present. As a result of the inspection, I have the following comments:

1. The Laskey Road facility manufactures mold and dies. A testing lab and administration offices are located at the Coining Drive facility. These businesses are reported to fall under the Standard Industrial Classification (SIC) Group of 3089. Industrial activities with potential exposure of pollutants to storm water include: material loading and unloading activities at loading bay/truck docks, the drum storage areas, in the event of a spill; material transferred from outside drums (which sometimes have operational taps) to the buildings; material transfer to the Laskey Road waste oil tank; wood pallet storage (both facilities); uncovered metal scrap bins used for waste (Laskey Road); and material transfer into the garbage dumpsters. Should the air pollution control equipment at the Laskey facility be needed in the future, the material transfer of waste from the equipment would also have the potential exposure of pollutants to precipitation.
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 Y 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 facilities 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 Laskey Road site and was available. It was reported that the Coining Drive facility SWP3 was similar to this document. The latest version of the SWP3 was dated September 2011. The latest signature and certification statement was dated 2008. The updated SWP3 must include the certification statement and be signed in accordance with Part VII.G. of the permit. *This is a violation of Part IV.D.4 of the permit.*
5. The SWP3 did include the material inventory, a spill prevention and response plan, and a site map. The specific Pollution Prevention Team members must be named. For the Laskey facility, catch basins were shown on the site map, but not the storm sewers or the outfalls for all of the catch basins. The site map also didn't show: the location of spill response equipment; note the pump at the loading/unloading dock; indicate the walls, fence, and the roof over the drum storage area; the wood pallet storage, the waste oil tank, the metal bin, and empty drums stored to the south of the building; the general refuse bins; and the metal bin that was on the northeast side of the building. Should the air pollution control equipment be used at Laskey, these units would also need to be shown on the site map. For the Coining Drive facility: site map didn't show: pallet storage; general waste bins; the walls, the fence around, and the roof over the drum storage area. Also, the SWP3 appeared to lack commitment to specific actions and/or timeframes for Good Housekeeping and Preventative Maintenance, since there were many activities that the SWP3 stated "should" happen. The SWP3 is required to describe and ensure the implementation of practices. Under the conditions of the permit, facilities must implement the provisions of the SWP3. *The missing details are a violation of Part IV.D. of the permit.*
6. A Comprehensive Site Compliance Evaluation was last performed in 2010.

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:

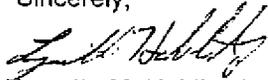
7. Employee Training – The permit requires training programs that shall inform personnel at all levels of the components and goals of the SWP3. Training should address topics such as spill response, good housekeeping and material management practices. The SWP3 shall identify periodic dates for such training. Toledo Molding & Die's SWP3 states that training will be conducted for new employees and annually for the SWP3 team and the spill response staff. I reviewed documentation for 2009 and 2010 which included employee signatures, training date, and topics. It appeared acceptable. 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).

Mr. Brian Kliesch
September 27, 2011
Page Three

8. Inspections- The SWP3 shall identify qualified personnel to inspect designated equipment and areas and specify inspection frequency. Tracking or follow-up procedures shall be used. Inspections shall be documented and records shall be maintained. Toledo Molding & Die's SWP3 stated that a weekly inspection checklist is used for the facilities and that monthly inspections are conducted of chemical storage areas. During the interview, it was reported that inspections are done weekly at Laskey and monthly at Coining. While this is acceptable, the SWP3 must accurately reflect the inspection schedule. I viewed the September 12, 2011, completed inspection report for the Laskey facility. This report form is used at both facilities. It was stated that staff do observe catch basins and storm sewers, however, the inspection report needs to include observations (i.e. "dry/no discharge", "clear discharge", etc.).
9. I observed a soap drum with a dispenser stored on a spill pallet just inside the truck dock. I recommend moving the drum away from the doorway to increase the time available for spill response.

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

pc: DSW, NWDO File

ec: Patekka Bannister, Division of Environmental Services, City of Toledo
NWDO Follow-up File