



Environmental  
Protection Agency

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

Re: Seneca County  
Quick Tab II  
Industrial  
Storm Water

October 3, 2011

Mr. Jim Hall, IT and Safety Director  
Quick Tab II  
241 Heritage Drive  
Tiffin, Ohio 44883

Dear Mr. Hall:

On August 16, 2011, I inspected Quick Tab II, located at 241 Heritage Drive, Tiffin. 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 No. 2GR01604. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility prints security documents, such as paychecks. It has a primary SIC code of 2752, Commercial Printing, Lithographic. NPDES permit coverage was granted June 5, 2009. 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 the uncovered garbage hopper; and disposal of wash water.
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 currently in the process of renewing the general permit, called the Multi-Sector General Permit (MSGP). The draft permit may be viewed at:  
[http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater\\_draft\\_GP\\_oct10.aspx](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 X 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.

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3. I did not observe any discharges during my inspection. Facility sampling is not required under the current permit and has not been performed. However, routine monitoring will be required under the MSGP. At this time, 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](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf).

A Storm Water Pollution Prevention Plan (SWP3) was available onsite. It was dated June 25, 2009. The SWP3 did include a Pollution Prevention Team and their responsibilities. In general, the SWP3 lacked sufficient detail. The SWP3 lacked descriptions of specific actions and/or timeframes for Good Housekeeping, Preventative Maintenance, Spill Prevention and Response, and Sediment and Erosion Controls. The site map did not contain most of the information required by the permit. *The missing details are a violation of Part IV.D. of the permit.* Please remember when revising the SWP3 that any report or document created for the permit must include the certification statement and be signed in accordance with Part VII.G. of the permit.

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:

4. 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. Quick Tab's 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).
5. 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. You reported that staff inspects the hopper area once per month, but this was not noted in the SWP3. *Failure to accurately document inspections is a violation of Part IV.D.3.d. of the permit.*

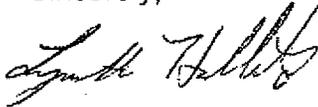
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6. Non-Storm Water Discharge Certification –The permit requires the SWP3 to contain a certification that the discharge has been tested or evaluated for the presence for non-storm water discharges. The SWP3 did not appear to include a Non-Storm Water Discharge certification. 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. *The lack of information is a violation of Part IV.D.3. g. of the permit.* Also, it was reported that the floor cleaner is discharged onto the pavement outside of the facility. This is an illicit discharge and must be discontinued.

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 compliance issues. Your response should include the dates, either actual or proposed, for the completion of the actions. It must also include a written certification that the requested changes to the SWP3 have been made.

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

/lr

pc: DSW-NWDO File

ec: Debra Reamer, Tiffin City Administrator, [cityadministrator@tiffinohio.gov](mailto:cityadministrator@tiffinohio.gov)