



Environmental
Protection Agency

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

Re: Seneca County
Taiho Corporation of America
Storm Water
Industrial

September 27, 2011

Mr. Doug Buillon
Taiho Corporation of America
194 Heritage Drive
Tiffin, Ohio 44883

Dear Mr. Buillon:

On August 16k, 2011, I observed industrial activities exposed to precipitation at Taiho Corporation of American (Taiho), 194 Heritage Drive, Tiffin (photos taken). Two large roll-offs were located on the west side of the facility. One was covered with a tarp, the second was not. It appears that storm water runoff from the building and the grounds surrounding the facility would drain overland and through catch basins into the City of tiffin's Municipal Separate Storm Sewer System (MS4).

Taiho manufactures bearings. According to the Harris Directory, Taiho has a Standard Industrial Classification (SIC) code of 3714, Motor Vehicle Parts and Accessories. Under 40 Code of Federal Regulations (CFR) 122.26 and Ohio Administrative Code (OAC) 3745-39, these facilities are required to obtain an NPDES permit to cover storm water discharges from: industrial plant yards; material handling sites; refuse sites; sites used for the storage and maintenance of material handling equipment; shipping and receiving areas; sites used for residual treatment, storage, or disposal; and areas where material handling equipment or activities, raw materials/intermediate products/by-products/waste materials/final products, or industrial machinery are exposed to storm water. This requirement has been in effect since 1992.

On February 27, 2009, Taiho submitted a No Exposure Certification form to Ohio EPA, No. GRN00242*DG. A No Exposure Certification allows facilities with no exposure of industrial activities to storm water to be conditionally excluded from National Pollutant Discharge Elimination System (NPDES) storm water permitting requirements. During our phone conversation on September 22, 2011, you stated that the roll-offs were permanently stored outside and contained metal chips. While the manufacturing process is performed indoors, the loading and storage of waste materials provide the potential for exposure of pollutants to storm water. This means the facility is not eligible for the No Exposure Certification. At present, we view the site as discharging industrial storm water unlawfully. Taiho must either eliminate the exposure of industrial activities to storm water and submit a new No Exposure Certification or submit an NPDES permit application. Please submit the required NPDES permit application to Ohio EPA's Central Office (Columbus, Ohio) within 60 days from the date of this letter.

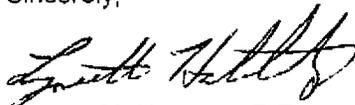
Ohio EPA is currently in the process of renewing the general NPDES permit, called the Multi-Sector General Permit (MSGP). The draft permit may be viewed at http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater_draft_GP_oct10.aspx. The NPDES permit will require that a Storm Water Pollution Prevention Plan (SWP3) be developed and implemented. The SWP3 must describe the Best Management Practices (BMPs) the facility will implement to prevent or minimize the discharge of pollutants in storm water runoff. BMPs are required to address several different aspects of facility operations, including good housekeeping, material handling and storage, and spill prevention and response.

Mr. Doug Bouillon
September 27, 2011
Page Two

If pursuing NPDES permit coverage, I recommend developing and implementing an SWP3 in accordance with the draft MSGP as soon as possible to minimize your liability. A web link to the Industrial SWP3 Guidance, as well as an SWP3 template can be found at http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater_draft_GP_oct10.aspx. The permit application for the MSGP is called a Notice of Intent (NOI). Copies of the NOI form, the No Exposure Certification form, and their instructions can be found at <http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

If you should have any further questions regarding the Storm Water Program, please call me at 419-373-3009.

Sincerely,



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

/cs

pc: DSW, NWDO File – Storm Water Industrial

ec: Debra Reamer, Tiffin City Administrator