



Environmental
Protection Agency

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

Re: Lucas County
Airport Auto Parts Inc.
Industrial
Storm Water

October 3, 2011

Mr. Stephan Serr, Sr.
Airport Auto Parts Inc.
1355 South Berkey Southern
Swanton, Ohio 43558

Dear Mr. Serr:

On September 21, 2011, I inspected Airport Auto Parts Inc., located at 1355 South Berkey Southern, Harding Township (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 No. 2GR00501. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility is an auto recycler, with a primary SIC code of 5015. NPDES permit coverage was granted August 2006. Industrial activities with potential exposure of pollutants to storm water include: outside storage of vehicle and vehicle parts, material transfer to and from used gas drum, diesel tank, transfer of parts into storage trailers/containers, such as the Large Core container, and any releases/leaks from vehicles or vehicle parts.
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
. 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 M outlines some of the Best Management Practices (BMPs) required for your industry.

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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. Airport Auto has conducted clearing and some grubbing activities on land to the south of the existing operations. The business plans to construct a new building and expand the yard. The total earth disturbance will be one acre or more. When one acre or greater of land will be disturbed during a project, discharges of storm water to waters of the state must be covered by either the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit, or CGP) or an individual NPDES permit for construction activities. As of the date of this letter, an NPDES permit application has not been received nor permit coverage granted for this project. ***Failure to obtain NPDES permit coverage prior to this is a violation of Ohio Revised Code (ORC) Section 6111.04.*** Most projects obtain coverage under the CGP. I understand that since my visit, you have contacted Tom Worline, PE, T.R. Worline & Associates, to assist you submitting a permit application. For instructions on obtaining permit coverage, please see: http://www.epa.ohio.gov/dsw/storm/construction_index.html.

The CGP requires that permanent post construction storm water management practices be implemented. For construction activities that disturb a total of 5 acres or more, the permanent structural post-construction practices must be installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times shall meet those in Table 2 of the permit.

4. There were no storm water discharges at the time of the inspection. Facility sampling is required under the current permit and has been performed. Monitoring data has exceeded the benchmark for TSS in the proposed permit and sometimes was close to exceeding Water Quality Standards for Oil & Grease and pH. Airport Auto is considering installing a sediment trap to address the TSS issue. You may want to investigate the feasibility of routing existing runoff through the post construction storm water management facilities that will be required for the new facility.

Routine monitoring will be required under the MSGP, which the facility already performs. 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.

5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite and had been revised in 2011. However, the signature and certification statement was dated 2000. The SWP3 did address the Pollution Prevention Team and their responsibilities; a Spill Prevention and Response Plan; Inspections; Employee Training; Non-Storm Water Discharge Certification, and most of the permit requirements. The site map needed to show the location of spill kits, wood pallet storage (near the crusher area) and that the outfall's discharge is controlled by a pump. The Spill Response Plan needs to include contact information for individuals or agencies that must be notified in the event of a spill, such as local emergency response agencies, the National Response Center, and Ohio EPA's Spill Hotline (see Part IV.D.3.c. of the permit). Inspections and visual outfall monitoring must be implemented at the frequencies stated in the SWP3 (quarterly). The reports need to include observations of the outfall structure/discharge, when the last measurable precipitation event occurred, and the size of the event. *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. This includes the quarterly inspection reports and annual Comprehensive Site Compliance Evaluation. Please make sure inspection reports need to include observations of the outfall structure, when the last measurable precipitation event occurred, and the size of the event.

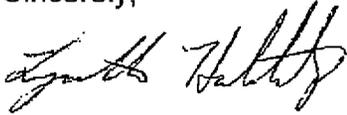
The pollution prevention efforts of inspecting incoming vehicles, performing dismantling under cover, and draining fluids from vehicles prior to storage appear to have been successful, as there was almost no visible staining in the yard. Overall, Airport Auto's implementation of Best Management Practices has resulted in a fairly clean and orderly facility.

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.

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If there are any questions, please contact me at (419) 373-3009.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynette M. Hablitzel". The signature is written in a cursive style with a large initial "L".

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

/llr

pc: DSW-NWDO File