



Environmental
Protection Agency

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

Re: Lucas County
Turbine Standard Ltd
Industrial
Storm Water

October 3, 2011

Mr. Mark Yavorsky, Quality Assurance/Inspection
Turbine Standard Ltd.
10550 Industrial Road
Holland, Ohio 43528

Dear Mr. Yavorsky:

On September 26, 2011, I inspected Turbine Standard Ltd, located at 10550 Industrial Road, Spencer Township. 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. 2GR01635. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility repairs, overhauls, and tests turboprop engines. It has a primary SIC code of 4581, Airports, Flying Fields & Airport Terminal Services. NPDES permit coverage was granted December 11, 2009. Industrial activities with potential exposure of pollutants to storm water include: material transfer at the Jet A fuel tank; outdoor testing of engines; material transfer and outside storage of the garbage dumpster (had a lid); and disposal of equipment 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
. 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 S 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. I did observe the storm water outlet structure during my inspection. The discharge appeared clear. 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.

A Storm Water Pollution Prevention Plan (SWP3) was available onsite. It was dated June 2, 2010. The SWP3 did include a Pollution Prevention Team and their responsibilities; a site map; a Spill Prevention and Response Plan; Employee Training; and Sediment and Erosion Controls. The SWP3 lacked descriptions of specific timeframes for Good Housekeeping and Preventative Maintenance. The Spill Response Plan did not include contact information for individuals or agencies that must be notified in the event of a spill. The location of spill response equipment must be noted on the site map. *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.

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. 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. The SWP3 stated that inspections are done quarterly.

Inspection checklists were reviewed. It appears that these double as the annual Comprehensive Site Compliance Evaluation.

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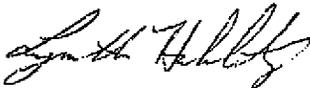
The reports need to include observations of the outfall structure, when the last measurable precipitation event occurred, and the size of the event. *Failure to accurately document inspections is a violation of Part IV.D.3.d. of the permit.*

5. 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. While the SWP3 did mention a Non-Storm Water Discharge certification, the SWP3 must include 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. *The lack of information is a violation of Part IV.D.3. g. of the permit.* Also, it was reported that equipment is washed outside with the wastewater discharged onto the pavement outside of the facility. The wastewater is not contained and collected. This is an illicit discharge and must be discontinued.

The facility has an existing oil-water separator which will be used when engine testing is moved into the new building addition. The separator reportedly goes to the sanitary sewer. I recommend contacting the sanitary sewer authority, Lucas County, before directing the wash water or moving the test area.

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

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pc: DSW-NWDO File