



4GR0038920100318

2010/03/18

4GR00389

ARVIN MERITOR



State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

March 18, 2010

Darrin Booker
Meritor Heavy Vehicle Systems
444 Hebron Road
Heath, OH 43056

Re: Industrial Storm Water Inspection, Permit Number 4GR00389*DG

Dear Mr. Booker:

This letter is written in follow-up to our joint industrial storm water inspection at Meritor located in Heath, Ohio on March 2, 2010. David O'Conner with Meritor was present during the inspection. The inspection evaluates compliance with your General Storm Water Permit Associated with Industrial Activities, issued by Ohio EPA. Based on my site evaluation and the conditions of the General Permit, the following items were evaluated:

Storm Water Pollution Prevention Plan (SWPPP):

- The SWPPP was evaluated during the inspection. The major components with the General Permit were addressed. At the time of the inspection, I requested an electronic submittal to my attention for further review. The SWPPP has subsequently been submitted and is current subject to review. The SWPPP must be updated to reflect any major changes at the facility on an annual basis.

Storm Water Collection:

- Significant portions of the storm water is collected and disposed off site. During the inspection we discussed alternatives to this management practice. Please ensure all storm water associated with the large roll offs are continually routed to the collection system concurrent with any proposed upgrades. At this time, I am formally requesting an opportunity to evaluate proposed alternatives to storm water collection.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Oil Storage:

- All oils were stored in a building located on the southern end of the facility. I requested the inside drains are verified with a connection to the waste collection system or plugged with concrete. I did receive verification the drains were plugged. However, I am requesting additional concrete be placed in the drains to further ensure containment. In addition, the entire building should be implemented with containment berms to minimize the threat of release during the loading/unloading process.

Spill Prevention, Control, and Countermeasure (SPCC) Plan:

- In accordance with 40 CFR, Part 112, this facility may require the development of a SPCC plan if one of the following thresholds are met:
 1. Aggregate above ground oil storage capacity is greater than 1,320 gallons.
 2. Buried oil storage capacity is greater than 42,000 gallons.
 3. In the event the SPCC requirements are not triggered for this facility, the SWPPP must include remedial measures in the event of a spill.

Roof Management:

- The SWPPP should include a roof management plan. The roof should be evaluated, at a minimum, on an annual basis to determine the presence of materials which may pose a threat to storm water quality. Roof inspections should be documented in your SWPPP.

Self Inspections:

- Self inspections are a requirement of your permit. All inspections must be conducted, addressing a minimum frequency appropriate for your facility. The inspections must be evaluated on an annual basis to determine trends and opportunities for improvement.

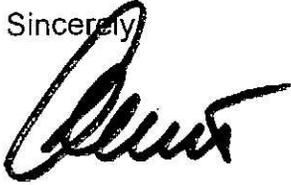
Oil Water Separator:

- A stand alone maintenance plan must be developed for this site. The maintenance plan will include inspection and maintenance protocols to ensure the intended function in perpetuity.

Darrin Booker
Meritor Heavy Vehicle Systems
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If you have questions regarding this letter or my inspection, please contact me at our Central District Office at 614-728-3844.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office

c: David O Conner, Arvin Meritor Inc.

HK/nsm Meritor March 2, 2010

