



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 30, 2010

RE: Medina County
Bailey Mfg Co.
NPDES Permit No. OHR000004
Ohio EPA Permit No. 3GR00041*DG
Industrial Storm Water Inspection

Mr. Alan Anderson, General Manager
Bailey Mfg Co.
P.O. Box 130
118 Lee Street
Lodi, OH 44254

Dear Mr. Anderson:

On September 23, 2010, Ohio EPA conducted an inspection at the Bailey Mfg Co., located at 118 Lee Street, City of Lodi, Medina County (Site). During the inspection, I was accompanied by you. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR00041*DG.

The storm water inspection documented the following deficiencies of the General Storm Water Permit that must be addressed in order to prevent a discharge of potential pollutants to "waters of the state:"

- The signature page located in Section 2.0 of the site's storm water pollution prevention plan (SWP3) must be updated and signed in accordance with Part VII.G of the General Storm Water Permit;
- Table 3.2 of the site's SWP3 details a list of potential pollutants located at the site and includes enamels. You stated that the site is no longer utilizing enamels;
- Section 4.4 and Section 4.6 of the site's SWP3 detail that bi-weekly routine inspections are to occur by utilizing the inspection form provided in Appendix B. The bi-weekly inspections are not occurring utilizing the inspection form in Appendix B;
- Section 4.5 of the site's SWP3 details employee training that addresses good housekeeping, spill prevention and response, and materials management to be performed. No records are being maintained to document that the employee training is occurring; and

Mr. Alan Anderson
Bailey Mfg Co.
September 30, 2010
Page 2

- Section 6.0 of the site's SWP3 requires a comprehensive site compliance evaluation (CSCE) to be performed. Part IV.D.4 of the General Storm Water Permit requires the CSCE to be performed annually. Copies of previous CSCE's could not be located. Please note that CSCE's are required to be maintained for at least three years.

Within thirty (30) days of receiving this inspection letter, written correspondence detailing how the deficiencies detailed above are to be addressed. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at chris.moody@epa.state.oh.us.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt