



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

September 14, 2009

RE: MEDINA COUNTY  
ROCKY RIVER BASIN  
LIVERPOOL TOWNSHIP  
THE BOEHM PRESSED STEEL COMPANY

Mr. Robert J. Boehm  
The Boehm Pressed Steel Company  
5440 Wegman Drive  
Valley City, Ohio 44280

Dear Mr. Boehm:

On August 17, 2009, Ohio EPA conducted an inspection of the Boehm Pressed Steel Company, located at 5440 Wegman Drive, Liverpool Township, Medina County (site). During the inspection, I was accompanied by Wayne R. Norton, Accounting Manager. 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. 3GR01156\*DG.

The inspection documented the following violations of the General Storm Water Permit that must be addressed:

- Failure to develop and implement a storm water pollution prevention plan (SWP3) for the site. The site's SWP3 must:
  - i. Identify pollutants which may come into contact or otherwise contaminate storm water runoff; Provide a map of the site indicating the location of pollutants and drainage patterns;
  - ii. Identify Best Management Practices (BMPs) to eliminate or minimize the exposure of those pollutants to storm water, including but not limited to: protecting pollutants from storm water runoff, run-on or snow melt; containment structures; good housekeeping; preventative maintenance; spill prevention and response procedures; and sediment and erosion control;
  - iii. Provide a protocol for regularly inspecting areas where pollutants are stored, processed or otherwise handled;
  - iv. Provide a protocol for correcting problems revealed by those inspections;
  - v. Provide a certification that there are no non-storm water discharges from the facility; and
  - vi. Identify a Pollution Prevention Team whose responsibility it is to implement and evaluate the effectiveness of the SWP3.

Mr. Robert J. Boehm  
The Boehm Pressed Steel Company  
September 14, 2009  
Page 2

Part III.D. of the General Storm Water Permit details the specific information that the site's SWP3 must contain. For your convenience, a copy of the General Storm Water Permit can be obtained from the following Internet address:

<http://www.epa.state.oh.us/dsw/storm/stormform.aspx>

- Failure to implement BMPs to address the following potential pollutant sources:
  - i. Concrete washing activities were discharging pollutants into the storm sewer system serving the site (Figure 1);
  - ii. The dumpsters are not completely covered, which allows precipitation to contact waste materials and discharge pollutants (Figure 2);
  - iii. Scrap hoppers are stored outdoors and are exposed to precipitation events (Figure 3);
  - iv. The pallet storage area has pollutants (i.e. residual oils, etc.) discharging onto the ground during precipitation events (Figure 4) and ultimately into the site's storm sewer system (Figure 5); and
  - v. Fifty-five gallon drums are being stored on their side exposed to precipitation events (Figure 6). Fifty-five gallon drums that are empty must be properly disposed of.

Within thirty days of receiving this inspection letter, BMPs addressing the above potential pollutant sources must be implemented and a copy of the site's SWP3 must be submitted for review. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118.

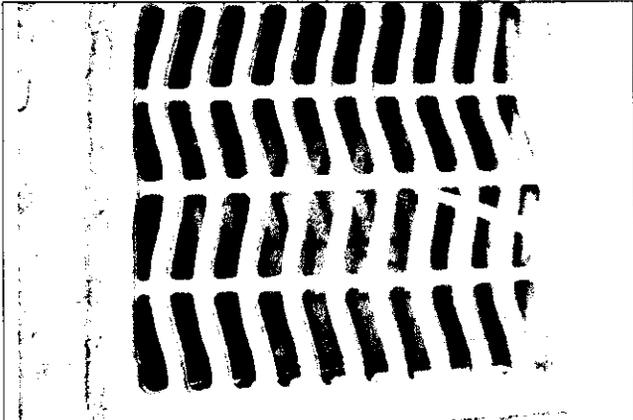
Sincerely,



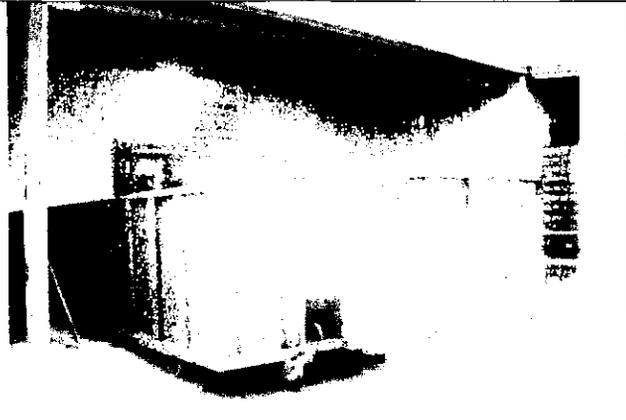
Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/mt

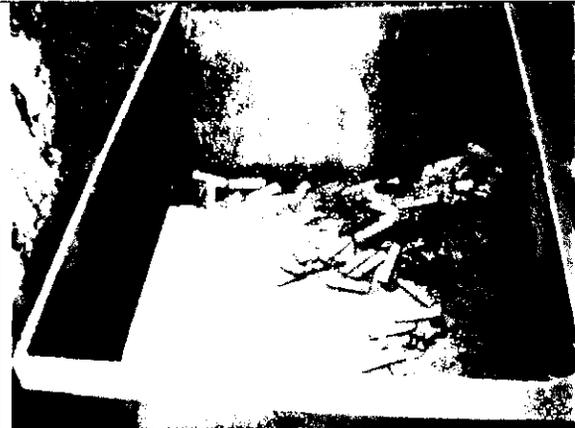
cc: Wayne R. Norton, Accounting Manager, The Boehm Pressed Steel Company



**Figure 1** – Concrete washing activities were discharging pollutants into the storm sewer system serving the site.



**Figure 2** – The dumpsters are not completely covered, which allows precipitation events to contact waste materials and discharge pollutants.



**Figure 3** – Scrap hoppers are stored outdoors and are exposed to precipitation events



**Figure 4** – The pallet storage area has pollutants (i.e. residual oils, etc.) discharging onto the ground during precipitation events.



**Figure 5** - The pallet storage area discharges onto the ground during precipitation events and ultimately into the site's storm sewer system.



**Figure 6** - Fifty-five gallon drums are being stored on their side exposed to precipitation events.