

**Environmental
Protection Agency**

Governor
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Director

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August 26, 2011

RE: MEDINA COUNTY
SHARON TOWNSHIP
ATLANTIC TOOL & DIE CO.
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR00715*DG
INDUSTRIAL STORM WATER

Mr. Russ Haid
Atlantic Tool & Die Co.
19963 Progress Dr.
Strongsville, OH 44114

Dear Mr. Haid:

On August 4, 2011, Ohio EPA conducted an inspection of Atlantic Tool & Die Co., located at 6965 Ridge Road, Sharon Township, Medina County (facility). During the inspection, the facility was represented by Calvin Schwarz, Maintenance Supervisor, and Jennifer Dumm, Human Resource Partner. 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. 3GR00715*DG. The inspection documented the following:

General Information

The facility manufactures various metal stamping products utilized in the automobile industry. Ms. Dumm provided that the facility's industrial activities are currently classified under U.S. Department of Labor's Occupational Safety and Health Administration's Standard Industrial Classification (SIC) Code 3469 Metal Stampings, Not Elsewhere Classified.

Storm Water Pollution Prevention Plan (SWP3)

- The facility is referred to as "P3" within the SWP3. The SWP3 must be revised to be reflective of the industrial activities that occur at "P3" and satisfy Part IV.D of the General Storm Water Permit. At a minimum, the revised "P3" SWP3 must include the following components:
 - a. The members of the pollution prevention team must be revised as Neil Bartone is no longer at the facility. In addition, Calvin Swartz has replaced Richard Roberts at "P3";

- b. The site map must also include existing structural control measure to reduce pollutants in storm water runoff, surface water bodies, locations where significant materials are exposed to precipitation, locations where major spills or leaks have occurred, and the locations of fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas, locations used for the treatment, storage or disposal of wastes, liquid storage tanks, processing areas and storage areas;
 - c. Risk identification and a summary of potential pollutant sources that includes a narrative description of the potential pollutant sources associated with loading and unloading operations, outdoor storage activities, outdoor manufacturing or processing activities, significant dust or particulate generating processes, and onsite waste disposal practices. The description shall also specifically list any significant potential source of pollutants at the site and for each potential source, any pollutant or pollutant parameter (e.g., biochemical oxygen demand, etc.) of concerns shall be identified; and
 - d. A narrative description of the facility's management of runoff.
- The SWP3 depicts an oil water separator in drain docks as a treatment BMP. The facility has not installed an oil water separator and the SWP3 must be reflective of the facility's industrial activities.

Facility Inspection

In addition to the SWPs deficiencies detailed above, the facility's SWP3 must be revised to incorporate or install best management practices (BMP) necessary to address the following items:

- Fifty-five gallon drums are stored outdoors in an area exposed to precipitation events. Many of the fifty-five gallon drums have not been properly capped to minimize or prevent the potential to discharge pollutants to "surface waters of the State" (Figures 1 to 2). The SWP3 details that the BMP to address the fifty-five gallon drums are not to be stored unsealed outdoors;
- Daily inspections of the outdoor storage container area are not being conducted. The weekly checklist must be utilized and maintained at the facility;
- Solid waste dumpsters have not been addressed via the SWP3. The solid waste dumpsters must be covered as any precipitation that contacts solid waste is considered a leachate that must be managed appropriately (Figure 3).

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Within thirty days of receiving this correspondence, please submit a copy of the facility's revised SWP3 and a letter detailing the corrective actions that have been implemented to address the above deficiencies. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via email chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Calvin Schwarz
Jennifer Dumm



Figure 1 – Many of the fifty-five gallon drums have not been properly capped.



Figure 2 – Many of the fifty-five gallon drums have not been properly capped.



Figure 3 – The solid waste dumpsters must be covered.