

Environmental
Protection Agency

Governor
Lt. Governor
Director

August 26, 2011

RE: MEDINA COUNTY
CITY OF SEVILLE
ATLANTIC TOOL & DIE CO.
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR01236*DG
INDUSTRIAL STORM WATER

Mr. Roger Riachi
Atlantic Tool & Die Co.
19963 Progress Dr.
Strongsville, OH 44114

Dear Mr. Riachi:

On August 4, 2011, Ohio EPA conducted an inspection of Atlantic Tool & Die Co., located at 4995 Atlantic Drive, City of Seville, Medina County (facility). During the inspection, the facility was represented by Chris Aviles, Plant Manager, 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. 3GR01236*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. The facility currently employs approximately seventy-four employees.

Storm Water Pollution Prevention Plan (SWP3)

- The facility is referred to as "P7" within the SWP3. Unfortunately, "P7" has not been included in numerous sections of the SWP3. The SWP3 must be revised to be reflective of the industrial activities that occur at "P7" and satisfy Part IV.D of the General Storm Water Permit. At a minimum, the revised "P7" SWP3 must include the following components:
 - a. The members of the pollution prevention team;
 - b. A description of potential pollutant sources;

- c. 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;
- d. Inventory of exposed materials;
- e. 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;
- f. Measures and controls that include an implementation schedule, good housekeeping, preventative maintenance, spill prevention and response procedures, inspections, Non-storm water discharge certification;
- g. Sediment and erosion control;
- h. A narrative description of the facility's management of runoff; and
- i. A comprehensive site compliance evaluation.

Facility Inspection

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

- A roll-off container is stored on the northern portion of the facility uncovered and in a location exposed to precipitation events (Figure 1). An orange liquid was observed to be draining from the roll-off container that was discharging to the facility's storm sewer collection system (Figure 2). Ohio EPA recommends that the roll-off container be covered (i.e. tarp, etc.), relocated to a covered storage area, installation of berms around the storage area be utilized to reduce or eliminate the potential to discharge pollutants to "surface waters of the State,"
- Hoppers are stored on the northern portion of the facility uncovered and in a location exposed to precipitation events (Figure 3). Contaminated storm water

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runoff was observed within the hoppers. The facility did not know how the contaminated storm water contained within the hoppers is managed. Ohio EPA recommends that the hoppers be managed similarly to BMPs recommended to address the roll-off container. In addition, the contaminated storm water must be properly collected and disposed (i.e. directed to a sanitary sewer); and

- Used oil/coolant is stored within totes on the northern portion of the facility (Figure 4). Information must be provided to clarify if the contract utilized to remove the used oil/coolant pumps directly from each tote or removes the entire tote. Ohio EPA recommends that spill kits be available within this location. In addition, the facility should have the ability to plug storm water inlets during used oil/coolant transfer events.

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: Chris Aviles
Jennifer Dumm

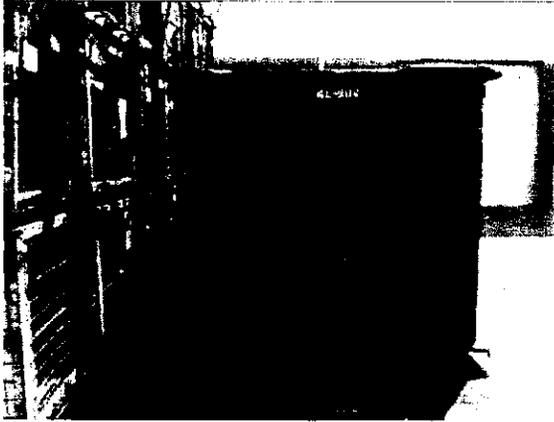


Figure 1 – A roll-off container is stored on the northern portion of the facility uncovered and in a location exposed to precipitation events.



Figure 2 – An orange liquid was observed to be draining from the roll-off container that was discharging to the facility's storm sewer collection system.

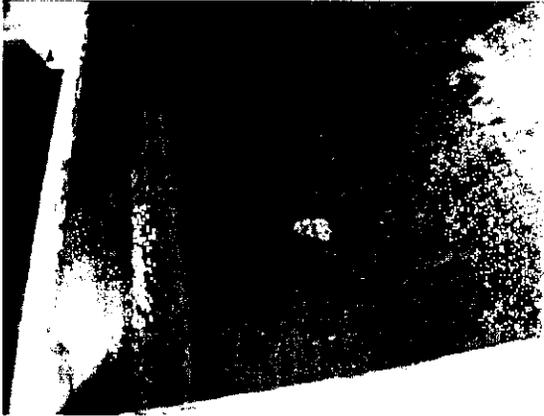


Figure 3 – Hoppers are stored on the northern portion of the facility uncovered and in a location exposed to precipitation events.

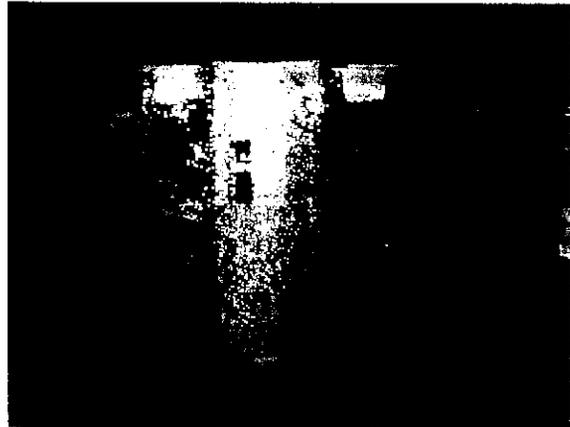


Figure 4 – Used oil/coolant is stored within totes on the northern portion of the facility.