

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

August 10, 2011

RE: TRUMBULL COUNTY
CITY OF WARREN
GLUNT INDUSTRIES, INC.
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR01084*DG
INDUSTRIAL STORM WATER

Mr. Dennis Glunt
Glunt Industries, Inc.
319 N. River RD NW
Warren, OH 44483

Dear Mr. Glunt:

On July 19, 2011, Ohio EPA conducted an inspection of Glunt Industries, Inc., located at 319 N. River RD NW, City of Warren, Trumbull County (facility). During the inspection, I was accompanied by Donna Kniss of Ohio EPA. The facility was represented by Gary Shells, Plant Manager, and Eric Williams, Project 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. 3GR01084*DG. The inspection documented the following:

General Information

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 3599: Industrial and Commercial Machinery and Computer Equipment.

The facility currently has approximately ninety employees that operate on two shifts per day. In March 2011, the facility's onsite septic system was decommissioned as the facility's wastewater was connected to the City of Warren's sanitary sewer for treatment.

Storm Water Pollution Prevention Plan (SWP3)

- Appendix B, Pollution Prevention Team, must be revised to detail the individual responsible for addressing item 7, "supervising all spill responses and cleanup activities."

- Mr. Williams is currently performing the compliance inspections; however, the inspections are not being documented in accordance with the SWP3. Section 4.1.3, Visual inspection, details that inspections are to be performed on a quarterly frequency and are to be recorded on the appropriate forms located in Appendix G. The quarterly inspections must be performed and documented utilizing the Appendix G form;
- The annual comprehensive site compliance evaluation (CSCE) is also not being conducted. The facility must perform the CSCE annually and document the findings and corrective actions on an appropriate form.

Facility Inspection

The facility's SWP3 must be revised to incorporate or install best management practices (BMP) necessary to address the following deficiencies:

- Stabilization (i.e. seed and mulch or stone) must be performed on the disturbed portion of the facility to prevent erosion from occurring, which would result in the discharge of sediment-laden runoff to "waters of the State" (Figure 1);
- The large scrap hopper is stored in a location that discharges to a 1,500 gallon tank. Environmental Specialists, Inc. is utilized to dispose of the waste water soluble cutting coolant on a two to four week frequency. The concrete berm in the large scrap hopper storage area requires maintenance to prevent or minimize the potential to discharge pollutants to "waters of the State" (Figure 2);
- 55-gallon drums and large totes are located throughout the facility. The SWP3 must be revised to address the proper storage of these containers so as to minimize or prevent the potential discharge of pollutants. Some of the 55-gallon drums were not properly capped (Figure 3);
- The 1,500 gallon above ground oil storage tank (OST) is stored in a location that discharges to the facility's storm sewer (Figure 4). To address the OST, one of the following items must be performed:
 1. Verify that the OST is double walled; or
 2. Provide a containment berm, wall, or other method necessary to contain one hundred ten percent (110%) of the OST's volume.

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The facility must comply with the applicable portions of U.S. EPA's spill prevention, control, and countermeasure plan regulations established within Title 40 Part 112 of the Code of Federal Regulations, which can be located at the following website:

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr112_main_02.tpl

In addition, a spill kit should be relocated to the OST in order to quickly address any spill or leak that may occur;

- The sand blasting area requires improved BMPs to prevent the potential pollutants from being discharged into the storm sewer system serving the facility (Figure 5). The SWP3 should be revised to increase the sweeping frequency of the sand blasting area; and
- On the east side of the facility hoppers are utilized to collect coolant soaked metal chips (Figure 6). These hoppers are located in areas exposed to precipitation events. Staining was present on the ground in the hopper locations (Figure 7). Coolant was also observed pooled within hoppers (Figure 8). BMPs must be implemented to address the hopper locations, which may include the construction of covers, berms for containment, or other method necessary to minimize or eliminate the potential for pollutant discharge.

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 at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Gary Shells, Plant Manager, Glunt Industries, Inc.



Figure 1 – Stabilization must be performed on the disturbed portion of the facility to prevent erosion.



Figure 2 – The concrete berm in the large scrap hopper storage area requires maintenance.

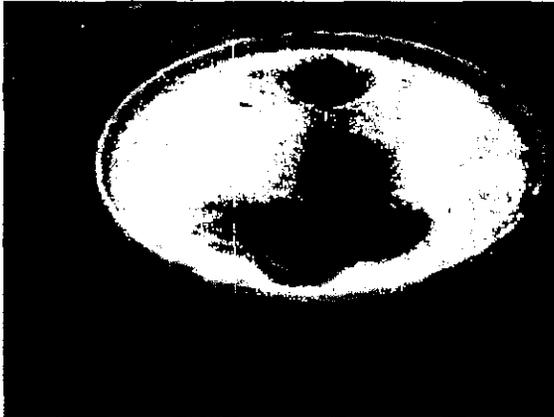


Figure 3 – Some of the 55-gallon drums located at the facility were not properly capped.



Figure 4 - A spill kit should be relocated to the OST in order to quickly address any spill or leak that may occur.

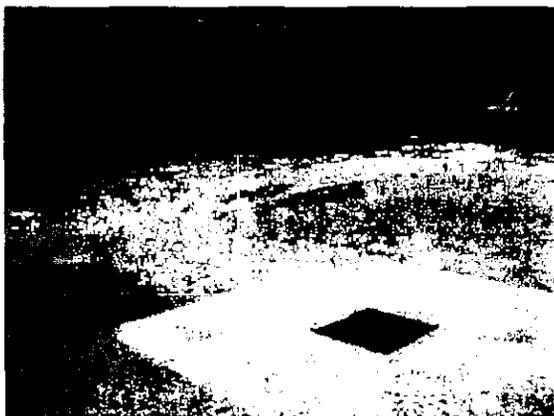


Figure 5 - The sand blasting area requires improved BMPs to prevent potential pollutants from being discharged.



Figure 6 - Hoppers are utilized to collect coolant soaked metal chips in locations exposed to precipitation events.



Figure 7 - Staining was present on the ground in the hopper locations.



Figure 8 - Coolant was also observed pooled within hoppers.