

**Environmental
Protection Agency**

Gov. Strouss, Governor
Lie. Fisher, Lt. Governor
Chris Jones, Director

September 7, 2010

RE: TIMKEN COMPANY – CANTON FACILITY
NPDES COMPLIANCE EVALUATION INSPECTION
OEPA PERMIT NO. 3GR01054*DG
STORMWATER

Mr. Dominic Nardis
Manager – EH&S Auditing
The Timken Company
Mail Code - GNE-24
1835 Dueber Ave, SW
PO Box 6927
Canton, OH 44706-0927

Dear Mr. Nardis:

On August 25 and 26, 2010, this writer conducted an inspection of your facility for the purpose of determining compliance with Ohio's stormwater regulations. You represented The Timken Company during the inspection. The Timken Steel Company is located south of the City of Canton, Stark County. Manufacturing consists of the production of specialty alloy steel and tapered roller bearing and components. Production is spread out over a 1200 acre site and is performed at 4 distinct plants: The Faircrest Steel Plant, Harrison Steel Plant, Gambrinus Steel Plant, and the Gambrinus Roller Plant. This writer inspected your plant in January 2010 to determine compliance with your direct discharge permit 3ID00021*JD for process and non-process wastewater. This inspection focused solely on stormwater and is summarized below:

In general the plant as it relates to exposure of pollutants stormwater runoff is fairly clean. Outside storage of fuel is stored in double walled containers and behind dikes. Dike water is pumped and taken to the Timken wastewater treatment plant. Stormwater runoff is collected at numerous points throughout the plants such as the Gambrinus Roller Plant east and west sides. In some areas of the plant, storm sewers have been routed to the wastewater treatment plant via gravity lines and pump station(s). There were a couple of areas pointed out that did need attention. One was a roll off box at the Faircrest Plant containing turnings. If possible all roll off boxes containing waste or recyclable materials should be covered. This specific box had a small pile of swarf lying adjacent to the box. The other was a scrap steel box at the Harrison Steel Plant that contained refuse and was tipped over.

We did observe the three outfalls that have been picked as representative of the plants' stormwater discharge. They are identified as outfalls 020, 023, and 029. Outfall 20 represents the discharge from the Faircrest Steel Plant. Located at the southwest corner of the plant property, this discharge is tributary to Petros Lake. We did not observe this outfall location directly as it could not be found. We did observe where it opens up in a large culvert on the west side of Perry Drive. No visual problems were noted.

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Faircrest Plant Outfall 020

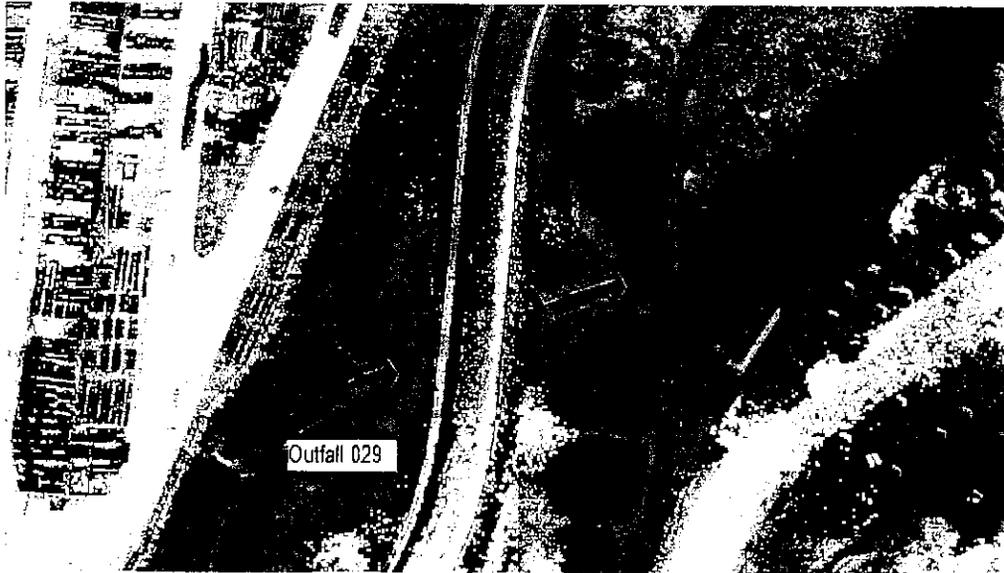


Outfall 023 represents the discharge of stormwater from the wastewater treatment plant.

Wastewater Treatment Plant outfall 023



Outfall 029 represents the discharge of stormwater from the main scrap storage area.



We reviewed the most recent analytical results that you had on these stormwater discharges and noted elevated levels of metals and suspended solids. You will be forwarding a copy of a spreadsheet that contains a summary of the last few years of data for these outfalls for evaluation.

We discussed the future design of the new lay down yard for storage of product at the Canton Bearing Plant. This office would like Timken to consider designing a yard that incorporates an environmentally friendly design to reduce runoff and improve water quality. It was suggested that the new yard be constructed to promote sheet flow runoff that involves some measure of infiltration and holding capacity to reduce the hydraulic load to the local stream. You may want to contact a consulting firm that is familiar with current design techniques to accomplish this task.

A cursory review of your SWPPP for the plants was performed. The plan appears to meet most of the administrative requirements of an SWPPP plan. The following items are recommendations for the plan:

- 1) The plan does need to be updated to reflect the changes at Timken in recent years such as the closing of the Gambrinus Bearing and Canton Bearing Plants.
- 2) One SWPPP plan should be created that addresses common components between the four plants, such as pollution prevention teams, good housekeeping practices, preventive maintenance, spill prevention and response procedures, employee training, etc... The four plants can then be listed in sections of the document to address any specifics such as site plans and drainage maps.

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- 3) The site plans that depict the storm sewers, process sewers, and process returns should also identify possible sources of exposure. For example: baghouse locations, fuel storage, scrap storage, mill scale storage, dumpsters, etc...
- 4) The reasons for choosing the three above mentioned outfalls for sampling over all the other stormwater discharge locations should be clearly identified in the SWPPP plan.

Should you have any questions concerning the information contained in this letter, please feel free to contact me at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt

File: Industrial Stormwater