

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 10, 2011

RE: COLFOR MANUFACTURING, INC
MALVERN OPERATIONS
OHIO EPA #: 3IS00115
STORM WATER
CARROLL COUNTY

Mrs. Jamie Greiner
EHS Manager
Colfor Mfg. Machining Division
Minerva Operations
461 Knox Court
Minerva, Ohio 44657

Dear Mrs. Greiner:

On March 16, 2011, this writer, accompanied by Ms. Lindsey Olmstead of this office, conducted an unannounced inspection of your facility for the purpose of determining compliance with the above referenced NPDES permit and the evaluation of two additional cooling towers. Colfor Manufacturing was represented by you during the inspection. The following is a summary of the visit:

Colfor Manufacturing, Inc., Malvern Operations, is located at 3255 Alliance Road, Carroll County. This facility manufactures cold and warm forgings primarily for the automotive industry. Colfor is an Industrial User and discharges to the BTM sanitary sewers, tributary to the BTM WWTP. The local sewer district receives the wastewater from the zinc coating line, the floor sweeper, restrooms, and any other potential sources of wastewater. The NPDES direct discharge only receives the storm water, non-contact cooling water, and cooling tower blow down. On the day of the inspection there were no visual problems noted at the discharge point, Sandy Creek, or immediately downstream. The creek was experiencing high flows due to recent storm events.

Other than storm water, the authorized direct discharges to waters of the state include non-contact cooling water and cooling tower blow down. In general, the site regarding the potential for exposure of pollutants to storm water is low. Areas that would be of concern, such as the dumpster, and roll off boxes are covered, or leak proof. Oil and grease interceptors are provided in areas where cuttings are stored in leak proof roll-offs.

A review of the effluent monitoring data submitted by the company since the most recent permit went effective on August 1, 2010, was conducted. Oil and Grease was the main parameter evaluated at the outfall. Approximately half the time this parameter was not detected, however, besides some low level values that were acceptable, the State Water Quality Standard of 10 mg/l was exceeded one time at 10.2 mg/l.

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The two proposed cooling towers will create an additional 437.5 gallons of flow to the existing outfall 001. The total combined flow of non-contact cooling water, and cooling tower blow down is well below 5% of the Sandy Creek critical low flow. The additional flow will not increase the current loadings of Sandy Creek. This correspondence will document the two additional cooling towers and an NPDES permit modification will not be necessary at this time.

If you should have any questions concerning this letter or the attached letter, feel free to contact the undersigned at (330) 963-1136.

Sincerely,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

Attachment

File: Industrial/Permit Compliance/Colfor Mfg. Malvern Operations