



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 24, 2009

RE: GM PARMA PLANT
CUYAHOGA COUNTY
CITY OF PARMA
NPDES PERMIT 3IS00043*DD

Ms. Diane Palmer
GM Parma Plant
5400 Chevrolet Boulevard
Parma, OH 44130

Dear Ms. Palmer:

On June 16, 2009, this office met with you to conduct an inspection of the above referenced facility. The purpose of the inspection was to obtain and review information in anticipation of renewal of the National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit for this facility expired on March 31, 2009. Receipt of the renewal application by Ohio EPA authorizes the permittee to discharge beyond the expiration date.

The GM Parma Plant is a stamping and metal assembly facility. Process and sanitary wastewaters are discharged to the sanitary sewer system. The discharge of process wastewater is subject to the requirements of the Northeast Ohio Regional Sewer District's (NEORS) pretreatment program.

The NPDES permit authorizes the discharge of noncontact cooling water (nccw) blowdown, fire system test water and storm water through outfall 001. Since the issuance of NPDES permit 3IS00043*DD the two sources of nccw blowdown (weld water and powerhouse) have been routed to the sanitary sewer.

Storm water drainage, south of the manufacturing building, is collected and treated by a belt skimmer oil/water separator prior to entering the storm water reservoir. Pumps at the end of the reservoir control the wet weather release. Drainage from the trench drains installed along the equipment pad storage area passes through the former coal pile treatment pit and enters at the end of the storm water reservoir.

Storm water drainage from the northern portion of the property is collected and combines with the storm water from the reservoir. The combined storm water flow is treated by a second oil/water separator prior to outfall 001.

In accordance with Parts IV, V and VI of the NPDES permit, the permittee has developed a storm water pollution prevention plan (SWP3). The plan was revised June 2008. The SWP3 identifies where various materials are stored and processed. Areas of exposure include, but are not limited to, the storage of miscellaneous scrap

Ms. Diane Palmer
GM Parma Plant
June 24, 2009
Page 2

equipment, rack storage, two tank farms (no longer in service), concrete truck wash area and the trash compactor. The SWP3 includes documentation of 1) yearly comprehensive site evaluations, last performed March 16, 2009; 2) yearly employee training; and 3) certification of non-storm water discharges.

Currently concrete truck wash water is discharged directly onto the ground which then migrates to the storm drainage ditch. In accordance with the SWP3 requirements the wash waters from the chutes and hoppers must be collected for proper disposal.

The weld water towers maintain a large diameter overflow pipe from the 40,000 gallon closed loop system sump. It is our understanding, should an extreme emergency occur (i.e., power outage) the contact cooling water from the closed loop system would collect in the sump and be released onto the ground from the overflow pipe. The NPDES permit does not authorize a discharge of contact cooling water. A discharge from this pipe would be an unauthorized discharge and must be reported in accordance with Part III of the NPDES permit.

This office received an anonymous complaint from the US EPA Criminal Investigation Division alleging residual liquid waste from a trash compactor flows into a sewer drain located near the compactor. The compactor is located on the southwest side of the main building near door #12. At the time of this inspection there was no evidence indicating residual liquid waste has or is discharging to the storm drain. This area is maintained under the requirements of the SWP3. No additional information is required at this time.

Review of the monthly discharge monitoring reports (DMR) received by the Ohio EPA for the period April 2004 through May 2009, indicates general compliance with the monitoring and reporting requirements of the NPDES permit; however, the data for oil & grease (O&G) may be invalid due to improper sample collection.

All parameters required by the NPDES permits are collected by the permittee and analyzed by a commercial contract laboratory except for pH which is performed by the permittee. Samples sent to the contract laboratory are submitted under a chain of custody. As discussed, O&G samples must be collected in a wide-mouth glass bottle with a teflon-coated lid and preserved with sulfuric acid. Collection in one container and transfer to the glass bottle is not permissible. It is our understanding proper collection of an O&G sample will be implemented as of the inspection date. The permittee must establish a manual of Standard Operating Procedures (SOP) that addresses sample collection, transportation, analysis and reporting procedures for this facility as specified in Part III of the NPDES permit. A copy of the SOP must be maintained by the permittee and made available upon request by this office. It is the expectation of this office that procedures specified by the SOP will be in place during future inspections.

Ms. Diane Palmer
GM Parma Plant
June 24, 2009
Page 3

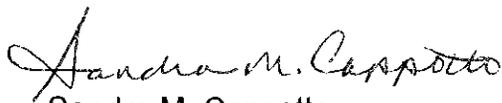
Within forty-five days of the date of this letter provide this office with written confirmation as to the proper management of concrete truck wash waters.

This office will proceed with renewing the NPDES permit. Since all nccw blowdown has been eliminated from outfall 001 this office will recommend deleting copper and ammonia monitoring from the NPDES permit. Our recommendation will also include the addition of total suspended solids monitoring to ensure no gross amounts of pollutants are leaving the site.

A draft copy of the renewal permit will be sent under separate cover. Any comments regarding the draft permit must be submitted in writing during the public notice period.

If you should have any questions, please contact this office at (330) 963-1124.

Sincerely,

A handwritten signature in cursive script that reads "Sandra M. Cappotto".

Sandra M. Cappotto
Environmental Scientist
Division of Surface Water

SMC/mt