



Environmental  
Protection Agency

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

Re: Hancock County  
Cascade Corporation  
Industrial  
Storm Water

July 13, 2011

Mr. Brain Wauford, Environmental, Safety, Training Specialist  
Cascade Corporation  
2000 Production Drive  
Findlay, Ohio 45840

Dear Mr. Wauford:

On June 13, 2011, I inspected Cascade Corporation, located at 2000 Production Drive, Findlay (photos taken). The purpose of my visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity, Facility ID No. 2GR01914. Ronnie Guy, Plant Staff Manager-Manufacturing; Dick Wilkin, Staff Manager-Manufacturing Services; and you were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures forklifts and automotive parts. It has a primary Standard Industrial Classification (SIC) code of 3531, Construction Machinery and Equipment.
2. While the current version of the permit has expired, your coverage remains in effect until Ohio EPA issues a new general permit. Ohio EPA is currently in the process of renewing the general permit, called the Multi-Sector General Permit (MSGP). The draft permit may be viewed at:  
[http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater\\_draft\\_GP\\_oct10.a.spx](http://www.epa.ohio.gov/dsw/permits/IndustrialStormWater_draft_GP_oct10.a.spx)

Once the general permit is renewed, Ohio EPA will send an application packet to all permittees instructing them on how to renew coverage. You will have 90 days from receipt of these instructions to renew permit coverage. At this time, I **recommend reviewing the MSGP**. Sections 1 through 8 pertain to all facilities. Subpart AB1 outlines some of the Best Management Practices (BMPs) required for your industry.

3. There were no storm water discharges during my inspection. Facility sampling is not required and has not been performed. However, routine visual monitoring will be required under the MSGP. The Agency is currently revising the frequency of monitoring in the draft permit. Once the permit is issued final, guidance on MSGP monitoring can be found at: [http://www.epa.gov/npdes/pubs/msgp\\_monitoring\\_guide.pdf](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf).
4. Industrial activities with potential exposure of pollutants to storm water include: material loading and unloading activities at the docking bay doors in the event of a spill, one day storage of final product, stock material, uncovered roll-offs: one for slag and one for scrap steel, empty drums; and wood pallets. General Refuse bin outside and uncovered.

Tarps were placed over equipment stored outside. Slag & quench tanks, which are used inside during maintenance but then emptied, are stored outside between uses. Several recycling bins (paper, plastic, aluminum) were located outside, but units were covered and labeled. A paint filter bin is loaded and unloaded inside, then tarped before being stored outside.

5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. It was dated 2007, but the certification statement was signed and dated September 27, 2010. The SWP3 did include the Pollution Prevention Team, the material inventory, a site map, the Non-Storm Water Discharge certification, the spill response plan, and the Comprehensive Site Compliance Evaluation. During the inspection I noted that there are several Best Management Practices (BMPs) in place that are not noted in the SWP3. For instance, the paint filter bin is loaded and unloaded inside, tarped, then stored outside. According to you, these BMPs are discussed in the Paint Line Manual. *Where BMPs are described in other documents, the SWP3 must at least reference these documents. Also, please be sure to include the certification statement with the Comprehensive Site Compliance Evaluation documentation.*

The NPDES permit requires that the SWP3 describe and insure implementation of storm water controls. These controls must address several different components of facility operations that are listed in the permit. Storm water control implementation issues were noted for the following facility operations:

6. Good Housekeeping - The permit requires BMPs that result in the maintenance of a clean, orderly facility. Metal shot was observed outside an open door on the south side of the building.

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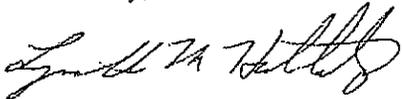
*This is a violation of Part IV. D.3.a. of the permit.* Increased visual monitoring and sweeping is recommended for this area.

The roll-offs for scrap and slag were not covered. The ground around these containers did have what appeared to be rust stains. Please make sure all outside bins and roll-offs containing material are covered or ensure the containers are leak proof. It should be noted under the draft MSGP, Section 2.2.1, permittees are required to minimize exposure of materials by locating them inside or protecting with a storm resistant shelter. Industrial materials do not need to be enclosed or covered if storm water runoff from affected areas will not be discharged to receiving waters.

7. Inspections & Employee Training – Cascade’s SWP3 provides for weekly and monthly inspections. With the exception of the metal shot observed outside an open door on the south side of the building, the frequency appears adequate. Employee training is conducted annually for all employees. Documentation was reviewed and appeared satisfactory.

Within 30 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the compliance issues noted in Item 6. Your response should include the dates, either actual or proposed, for the completion of the actions. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.  
Division of Surface Water  
Storm Water Section

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ec: Meghan Clement, City of Findlay, mclement@findlayohio.com

~~cc: DSW/NWD/EO/Elle~~