



Environmental
Protection Agency

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

Re: Hancock County
Fabco Inc.
Industrial
Storm Water

July 13, 2011

Mr. Keith Kuchera, Safety Manager
Fabco Inc.
P. O. Box 673
Findlay, Ohio 45839

Dear Mr. Kuchera:

On June 13, 2011, I inspected Fabco Inc., located at 2500 Fostoria Avenue, 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. 2GR01543. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures loader buckets and bulldozer blades. 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.state.oh.us/dsw/permits/IndustrialStormWater_draft_GP_oct10.aspx.

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 the Best Management Practices (BMPs) required for your industry.

3. 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.

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Once the permit is issued final, guidance on MSGP monitoring can be found at: 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, storage of wood pallets, storage of final product and raw materials (metal), and an uncovered roll-off for municipal solid waste.
5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. It was signed but must be dated and must contain the certification statement. The SWP3 did list the Pollution Prevention Team, the material inventory, and spill response. Names and phone numbers must be provided for Pollution Prevention Team instead of just position titles. The SWP3 included a site map. However, the site map did not show the location of the garbage roll-off, material loading/unloading areas, raw material and final product storage areas, and spill kits. *The missing details are a violation of Part IV.D.2.a. of the permit.*

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. Specific actions and timeframes were not described in the SWP3. I observed a lot of particulate matter that appeared to be rust on the pavement to the north of the building. *This is a violation of Part IV. D.3.a. of the permit.* Routine sweeping is recommended.

The roll-off for municipal waste was not covered. 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. Preventive Maintenance & Management of Runoff- The permit requires BMPs that shall involve: the inspection and maintenance of storm water management devices; the inspection and testing of facility equipment and systems to uncover conditions that could cause failures resulting in discharges of pollutants; and ensuring the appropriate maintenance of equipment and systems. Under Management of Runoff, the SWP3 must include a narrative consideration of practices used to divert, infiltrate, reuse, or otherwise manage runoff in a manner that reduces pollutants. The SWP3 shall provide that appropriate measures are implemented.

The SWP3 did not appear to describe preventive maintenance BMPs or management of runoff. The Annual Review did note the need to clean out the catch basin just northwest of the building. I observed material built-up inside. Most of the paved area with the high particulate matter drains into this basin. The pavement appeared to have been extended somewhat towards this basin. *Failure to implement Preventative Maintenance BMPS and consider runoff management practices are violations of Part IV.D.3.b and i. of the permit.* The catch basin must be cleaned. In addition to pavement sweeping, I recommend that Fabco establish a grass buffer between the pavement and catch basin to reduce particulate matter in the runoff. If velocity is an issue in this location, installing geosynthetic products could increase the amount of shear stress that vegetation will handle. Another option to reduce particulate matter would be installing some type of catch basin filter or insert.

8. Inspections & Employee Training – Fabco's SWP3 states that annual inspections will be performed. Detailed documentation of the inspection (areas, observations) did not appear to be included in the SWP3. Inspections shall be documented and records shall be maintained. *Please see Parts IV.D.3.d and g. of the permit.* Please be aware that the draft Multi-Sector General Permit will require quarterly routine inspections as a minimum.

The SWP3 states that employee training is conducted annually for forklift drivers. The draft Multi-Sector General Permit will also require that employee training be conducted at least annually.

9. Non-Storm Water Discharge Certification - The permit requires the SWP3 to contain a certification that Fabco's storm water discharge has been tested or evaluated for the presence for non-storm water discharges. A description of the results of any test or evaluation, the evaluation criteria or testing method used, the date of the assessment and the onsite drainage points that were observed must be included in the SWP3.

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While it was reported that there are no illicit discharges, supporting documentation and the certification statement was absent. *This lack of information is a violation of Part IV.D.3. g. of the permit.*

There were no storm water discharges during my inspection. However, in the catch basin located west of the building, I observed flow in the pipe entering from the east. You were not sure what the source of the discharge was. The property must be investigated for non-storm discharges.

10. Sediment and Erosion Control- The SWP3 must identify areas that have a high potential for erosion and implement measures to limit it. There was an unstabilized ditch bank in the northwest corner of site. This needs to be stabilized. *The failure to identify areas of erosion in your SWP3 and to implement measures to limit erosion is a violation of Part VI.D.3.h. of the permit.*

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 Items 5, 6, 7, 9, and 10. 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,



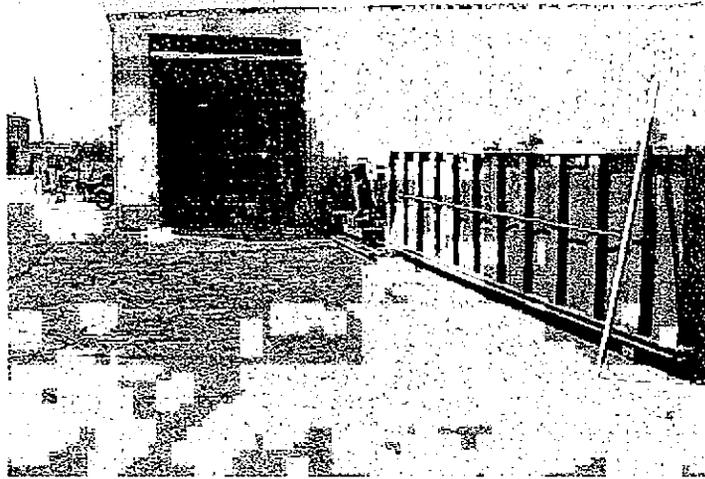
Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Section

/llr

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

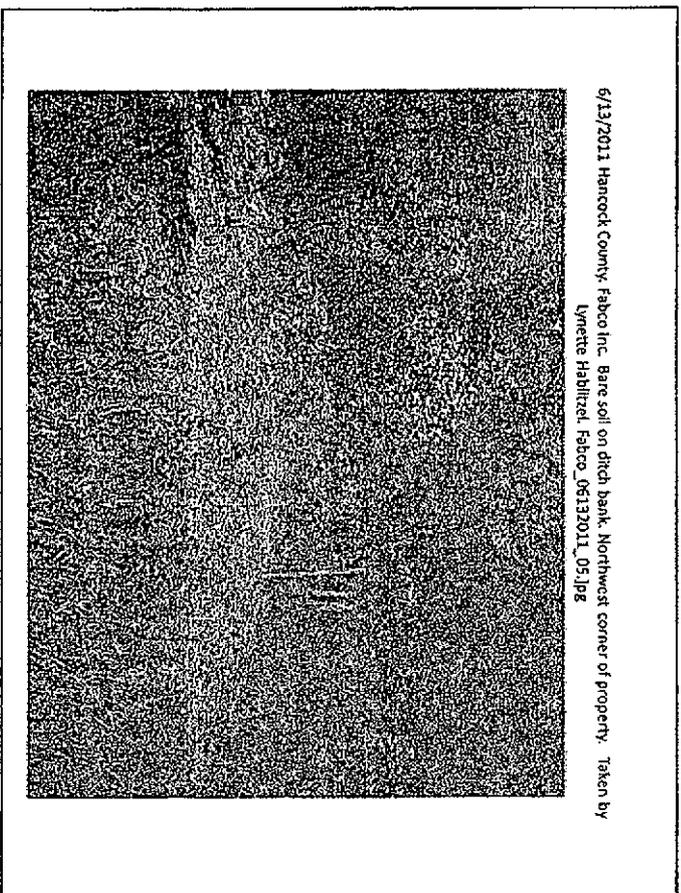
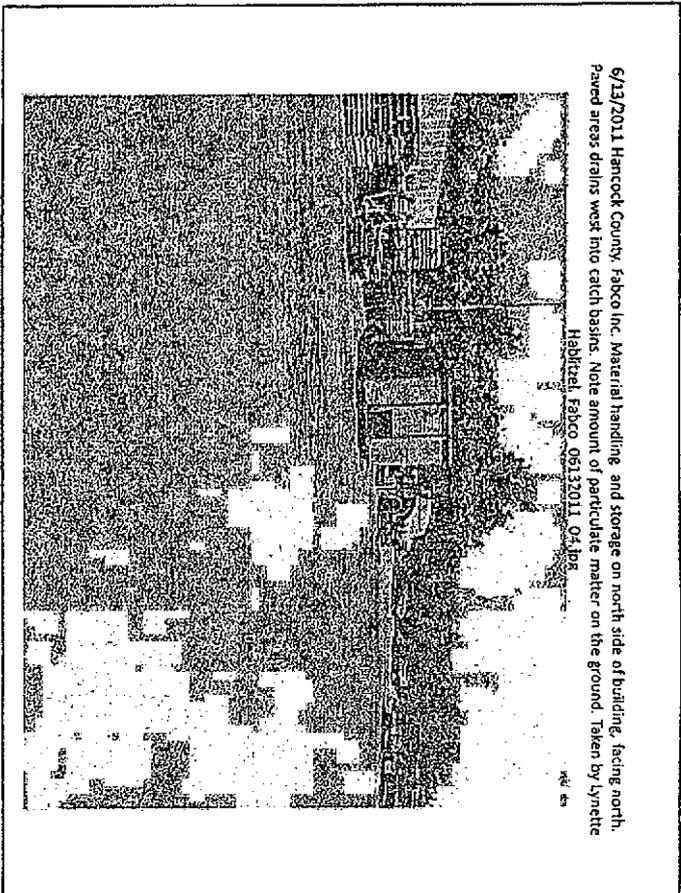
~~PC~~ DSW-NWDO File

6/13/2011 Hancock County, Fabco Inc. Material handling area on north side of building. Domestic trash in hopper, uncovered. Note amount of particulate matter on the ground. Taken by Lynette Habitzel. Fabco_06132011_01.jpg

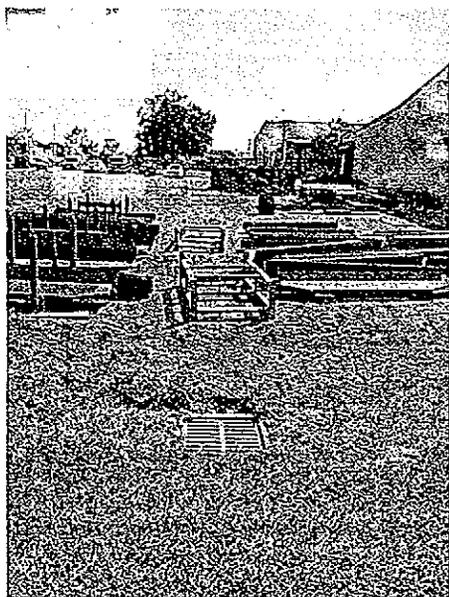


6/13/2011 Hancock County, Fabco Inc. Material handling and storage on north side of building, facing west. Paved areas drains west into catch basins. Note amount of particulate matter on the ground. Taken by Lynette Habitzel. Fabco_06132011_02.jpg and _03.jpg





7/5/2011



6/13/2011 Hancock County, Fabco Inc.
Northeast side of building, facing east.
Material handling and storage. Paved areas
drains west into catch basin. Note amount
of particulate matter on the pavement.
Taken by Lynette Hablitzel.
Fabco_06132011_06.jpg