



Environmental
Protection Agency

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

Re: Hancock County
Findlay Products Corp.
Industrial
Storm Water

July 7, 2011

Mr. Adam Bates, Corporate Environmental Manager
Midway Products Group
One Lyman E Hoyt Drive,
Monroe, Michigan 48161

Dear Mr. Bates:

On June 7, 2011, I inspected Findlay Products Corp., located at 2045 Industrial 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. 2GR01554. You were present to provide information. For part of the interview, Terry Nordy, Maintenance Manager, and Kevin Barnette, Engineering Manager, were also present. As a result of the inspection, I have the following comments:

1. The facility manufactures automotive parts. It has a primary Standard Industrial Classification (SIC) code of 3465, Automotive Vehicle Metal Stamping.
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 AA1 outlines the Best Management Practices (BMPs) required for your industry.

3. I did not observe any discharges during my inspection. Facility sampling is not required and has not been performed.

However, routine 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.

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, metal scrap bins, storage of plastic & metal pallets, storage of metal parts racks, and fume collection systems.
5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. The latest revision was dated January 11, 2011, with a signature & certification statement. The SWP3 did list the Pollution Prevention Team, the material inventory, and spill contact information. There have not been any reportable spills at the facility. 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 fume collection system (roof vents), scrap roll-offs located on the northeast side of the building, the truck trailers that are rusting and the materials stored in the lean-to on the west side of the building, spill kits, and the parts racks stored on the east side of the building. *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. I observed scrap cardboard on the ground around the trash compactor. Also, there were three semi-trailers stored adjacent to the ditch along the west side of the site. The pavement was stained orange from the trailers to the edge of the pavement along the ditch. *This is a violation of Part IV. D.3.a. of the permit.*

Please make sure all scrap bins 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.

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7. Inspections & Employee Training – Findlay Products SWP3 states that annual inspections will be performed. It also states that employee training is only conducted for new employees and when there is a change in the facility or program. Please be aware that the draft Multi-Sector General Permit will require quarterly routine inspections as a minimum. It will also require that employee training be conducted at least annually.
8. Non-Storm Water Discharge Certification - The permit requires the SWP3 to contain a certification that Findlay Product'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. While a statement was made that there are no illicit discharges, documentation was missing. *This lack of information is a violation of Part IV.D.3. g. of the permit.*
9. Findlay Products has asphalt drives and parking areas. Some municipalities have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Storm water Center and by the City of Austin, TX, has shown these sealants contaminate soil and runoff with PAHs and benzo(a)pyrene, a known carcinogen. If a sealant must be used, asphalt-based sealants are preferred.

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, and 8. 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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~~cc: DSW-NWDO File~~

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