



Environmental
Protection Agency

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

Re: Hancock County
Molten (North America) Corp.
Industrial
Storm Water

August 1, 2011

Mr. Guy Crawford, EHS/HR Manager
Molten (North America) Corporation
1835 Industrial Drive
Findlay, Ohio 45839

Dear Mr. Crawford:

On July 13, 2011, I inspected Molten (North America) Corp., located at 1835 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. 2GR01586. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures plastic and rubber automotive parts. It has Standard Industrial Classification (SIC) codes of 3069 and 3089, plastic products and fabricated rubber products.
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.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 Y outlines the Best Management Practices (BMPs) required for your industry.

3. 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.

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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 scrap steel and metal pipes and racks; scrap plastic stored in uncovered cardboard boxes; material transfer into the tarped paint sludge roll-off box (this is filled once per week), empty drum (from oils and other chemicals) storage, and paint line emissions.
5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. Notes indicate that it was last amended March 4, 2011, but it was last signed in 2009. That signature did not include the required certification statement. The SWP3 did list the Pollution Prevention Team, the material inventory, and include a site map. The loading and unloading areas should be specifically labeled. *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 described in the SWP3, except for the trash compactor area. The compactor area was clear, but any BMPs implemented under Part IV.D.3.a. of the permit must be described in the SWP3. I observed rust on the pavement to the southeast of the building. There was no visual evidence of it migrating towards catch basins. However, this area should be noted in the SWP3 and monitored. BMPs may be required if evidence indicates the material is discharging from the site.
7. Preventive Maintenance – 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. The SWP3 did refer to a Preventative Maintenance Plan (PMP). I observed on the west side of the facility that the grates were off the Shipping Area trench on the west side of the building due to the concrete crumbling. This is on Maintenance's To Do list. As required by Part IV.D.3.b of the permit, please be sure to complete this repair as soon as possible.
8. Inspections & Employee Training – Molten's SWP3 states that semi-annual inspections will be performed. 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 the Spill Team; other employees are trained as needed. The draft Multi-Sector General Permit will also require that employee training be conducted at least annually.

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9. Non-Storm Water Discharge Certification – The permit requires the SWP3 to contain a certification that Molten's storm water discharge has been tested or evaluated for the presence of 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. This information was absent from the SWP3. *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. 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. I observed some bare soil near the receiving dock. 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. 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

/cs

pc: DSW, NWDO File

ec: Meghan Clement, City of Findlay