



Environmental
Protection Agency

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

Re: Hancock County
Pieco, Inc. dba Superior Trim
Industrial
Storm Water

August 1, 2011

Mr. Jeff Putnam, Quality Engineer
Superior Trim
2151 Industrial Drive
Findlay, Ohio 45840

Dear Mr. Putnam:

On July 13, 2011, I inspected Pieco, Inc. dba Superior Trim, located at 2151 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. 2GR00599. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures interior trim pieces for semi-truck cabs. It has a primary Standard Industrial Classification (SIC) code of 2396, Automotive and Apparel Trimmings.
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 V 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.

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; outside storage of equipment, empty totes and drums, metal racks, wood crates and pallets; and spillage from the trash compactor.
5. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. The last certification statement was signed and dated September 14, 2007. The SWP3 did include the Pollution Prevention Team, the material inventory, and a site map. During the inspection, I noted that the locations of catch basins, the location of the storm sewers (indicating direction of flow), and the location of material storage (empty drums on the east side of the building) didn't always match what was depicted on the site map. *The missing details are a violation of Part IV.D.2.a. of the permit.* The loading and unloading areas and various chemical storage areas were not specifically labeled on the site map, but this was corrected while onsite.

While the facility has an SPCC plan and an Environmental Management Systems (EMS) plan, these were not mentioned in the SWP3. Where BMPs are described in other documents, the SWP3 must at least reference these documents.

A Comprehensive Site Compliance Evaluation was last performed March 1, 2011. While there was a signature, the documentation must include the certification statement.

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. Some litter was observed in the catch basins and around the trash compactor. Increased visual monitoring and sweeping is recommended for this area.
7. Inspections & Employee Training – Superior Trim's SWP3 provides for semi-annual inspections. The date of any resulting corrective action from these inspections needs to be documented. Please be aware that the draft Multi-Sector General Permit will require monthly and quarterly routine inspections for various areas of your facility. Employee training is conducted annually for shipping and stock employees as well as group leaders. Documentation was reviewed and appeared satisfactory.
8. Non-Storm Water Discharge Certification – The permit requires the SWP3 to contain a certification that Superior Trim'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. The SWP3 indicated a visual assessment was performed in 2005. Signed certification statements dated in 2006 and 2007 were included. When performing dry weather screening, documentation should be included of the dates and amounts of the last storm events.

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You reported that the building's floor drains, including process areas and bathrooms, are connected to the separate storm sewer. All except the bathrooms were reported to be sealed with a rubber plug with a metal cap. We examined one of the plugs. It was very difficult to remove its metal cap. The underside of the cap was a shiny metal and the facility routinely cleans floors (appeared to be a tight seal). *If relying on these structural controls to prevent an illicit discharge, the plugs must be included in routine documented inspections.* On July 21, 2011, I received an e-mail from you stating that the City of Findlay has since dye tested the floor drain in bathroom and it leads to the sanitary sewer.

9. Sediment and Erosion Control – The SWP3 must identify areas that have a high potential for erosion and implement measures to limit it. While Superior Trim's SWP3 did discuss several onsite issues, there was an implementation issue. I observed erosion along the west side of the building's foundation (dripline from roof), just south of the southern-most loading dock. A significant amount of sediment had washed into the loading dock area. This needs to be stabilized. *The failure 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 above issues. 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
NWDO Follow-up File