



Environmental
Protection Agency

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

Re: Lucas County
Hammill Company
Industrial
Storm Water

August 11, 2011

Mr. Greg Cutter, Corporate Quality Manager
Hammill Manufacturing Company
360 Tomahawk Drive
Maumee, Ohio 43537

Dear Mr. Cutter:

On July 28, 2011, I inspected several divisions of Hammill Manufacturing Company (HMC). Hammill Precision Tooling, Facility ID Number 2GR00306, is located at 5020 Enterprise Drive, Toledo. Hammill Manufacturing Company, Facility ID Number 2GR00308, is located at 1517 Coining Drive, Toledo. Hammill Manufacturing Company, Facility ID Number 2GR01560, is located at 360 Tomahawk Drive, Maumee. The purpose of my visits was to evaluate compliance of the sites with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity. Mr. Jeff Mack and you were present to provide information for the facility at 1517 Coining Drive. Mr. Blaine Best and you were present to provide information for the facility at 360 Tomahawk Drive. As a result of the inspection, I have the following comments:

For All Facilities

1. 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 in the process of renewing the general permit, called the Multi-Sector General Permit (MSGP). The draft MSGP may be viewed at:
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 AA outlines some of the Best Management Practices (BMPs) required for your industry.

Please be aware that the draft Multi-Sector General Permit will require at least quarterly routine documented inspections of all areas of the facility where industrial activities or materials are exposed to storm water and of all storm water control measures used to comply with this permit. The draft Multi-Sector General Permit will also require at least annual employee training of all employees who work in areas where industrial activities or materials are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g. inspectors, maintenance personnel).

2. There were no storm water discharges at any of the facilities 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.
3. A Storm Water Pollution Prevention Plan (SWP3) has not been developed for any of the sites. *This is a violation of Part IV of the permit.* SWP3s must be developed and implemented for both the Tomahawk Drive and Coining Drive facilities.
4. I recommend spill kits be located by loading/unloading docks and bays where liquids are transported.
5. Hammill 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.

Hammill Precision Tooling, 5020 Enterprise Drive

You reported that the property was sold several years ago. According to the Lucas County Auditor's website, the site was purchased by Fabri-Steel Properties LLC in 2008. When I stopped by the property, a sign on the building indicated it was occupied by Fabri-Steel Supply Company. There was nothing stored outside and no obvious residual exposure of materials to storm water. You may either submit a Notice Of Termination (NOT) now to end permit coverage or not submit a permit application when Ohio EPA sends you notification on how to renew permit coverage for this site.

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The NOT form and instructions can be found at:
<http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

Hammill Manufacturing Company, 1517 Coining Drive

1. This facility fabricates fixtures for the automotive and appliance industries which are used to hold parts during the machining process. It has a primary Standard Industrial Classification (SIC) code of 3499, Fabricated Metal Products, Not Elsewhere Classified.
2. Industrial activities with potential exposure of pollutants to storm water include: material loading and unloading activities at loading bays/truck dock in the event of a spill; material transfer and outside storage of scrap metal chips; and material transfer into the garbage dumpster.

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:

3. Good Housekeeping - The permit requires BMPs that result in the maintenance of a clean, orderly facility. Scrap metal chips are stored in an uncovered roll-off which has a berm around it. Safety Clean pumps the storm water from this secondary containment and hauls it away. Some chips had spilled outside of the berm. *This is a violation of Part IV. D.3.a. of the permit.* Increased visual monitoring and sweeping is recommended for this area.

The lid on the garbage dumpster appeared to be broken. 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.

Hammill Manufacturing Company, 360 Tomahawk Drive

1. This facility fabricates orthopedic implant devices such as artificial knees and surgical screws. It has a primary Standard Industrial Classification (SIC) code of 3499, Fabricated Metal Products, Not Elsewhere Classified.

2. Industrial activities with potential exposure of pollutants to storm water include: material loading and unloading activities at loading bays/truck dock in the event of a spill; air pollution control equipment from polishing operations (replacing the collection drums below the devices); and material transfer into the garbage dumpster.

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:

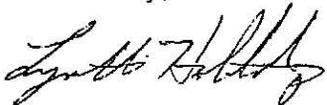
3. Good Housekeeping - The permit requires BMPs that result in the maintenance of a clean, orderly facility. I observed grey-blue dust on the ground around air pollution control equipment and the drums below them. *This is a violation of Part IV. D.3.a. of the permit.* Increased visual monitoring and sweeping is recommended for these areas.
4. Non-Storm Water Discharge Certification - The permit requires the SWP3 to contain a certification that Hammill'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 it was reported that there are no illicit discharges, supporting documentation and the certification statement is required.

I observed a large damp orange stain on the wall and pavement outside and below the truck dock door opposite of the compressor room. It was originating from the pit below the truck dock leveler. Moisture and what appeared to be an absorbent pad was noted on the floor near the truck dock door in the compressor room. It also appeared that the carbon filter and its effluent bucket may be located on the truck dock leveler. The orange staining could be due to precipitation entering the leveler and resulting corrosion, however, the other adjacent docking bays did not have this staining. The staining may also be due to liquid from the compressor room seeping out through the truck dock leveler. In either case, the property must be investigated for non-storm water discharges. Compressor room discharges must be directed to the sanitary sewer. This area should be noted in the SWP3 and monitored. BMPs may be required if evidence indicates that material is discharging from the site.

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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

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~~pc~~ DSW-NWDO-File

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