



Environmental
Protection Agency

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

March 14, 2011

Tim Hund
Daifuku America Corporation
6700 Tussing Road
Reynoldsburg, OH 43068-4006

**Re: Daifuku America Corporation / Franklin County
No Exposure Certification Permit 4GRN00125*DG**

Dear Mr. Hund:

This letter is written regarding a preliminary storm water investigation I conducted at your facility on March 9, 2011. The purpose of the inspection was to verify your No-Exposure Exemption (NOE) in accordance with Ohio EPA's Storm Water Program.

This facility is required to seek storm water permit coverage, from Ohio EPA in accordance with 40 CFR 122.26, authorizing storm water discharges or obtain a NOE. The permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP mandates specific storm water practices, which minimize storm water contamination, associated with external operations or exposed materials.

It is my understanding; you have submitted and obtained a No-Exposure Exemption for this facility as you claim there are no activities or exposed materials, which pose a threat to storm water. This inspection was conducted to ensure your NOE is valid.

Based on my observations, I noted the following (also, please see attached pictures):

1. I did not observe any raw material stored outside. If raw material, i.e., steel, will be stored outside, insure that there are no pollutants or chemicals that would leach off the steel such as total toxic organics.
2. There were several dumpsters that were not covered. Please insure your dumpsters are covered.
3. There was material handling equipment for a painting operation that was stored outside. The paint was chipping off the material handling equipment on to the pavement. Best management practices must be development for the storage of this material handling equipment, i.e., under roof and in containment.
4. There was material handling equipment, not associated with the painting operation, stored outside. If the material handling equipment will be stored outside, insure that there are no pollutants or chemicals that would leach off the equipment such as total toxic organics.

Tim Hund
Daifuku America Corporation
Page -2-

The items listed above would invalidate your NOE. As a result, you must address the above items to be in compliance with your NOE within 45 days from the date of this letter. If the above items are not addressed within 45 days, you must submit a Notice of Intent (NOI) application and develop and implement a SWPPP. Additional information regarding the Industrial Storm Water Permit and application can be found at the following address:
http://www.epa.state.oh.us/dsw/storm/industrial_index.aspx.

At this time, I am formally requesting a response regarding the corrective actions necessary to address items which would nullify your exemption stated in the paragraph above. If you have any questions regarding this letter or my inspection, please do not hesitate to contact me at our Central District Office at 614-728-3851.

Sincerely,



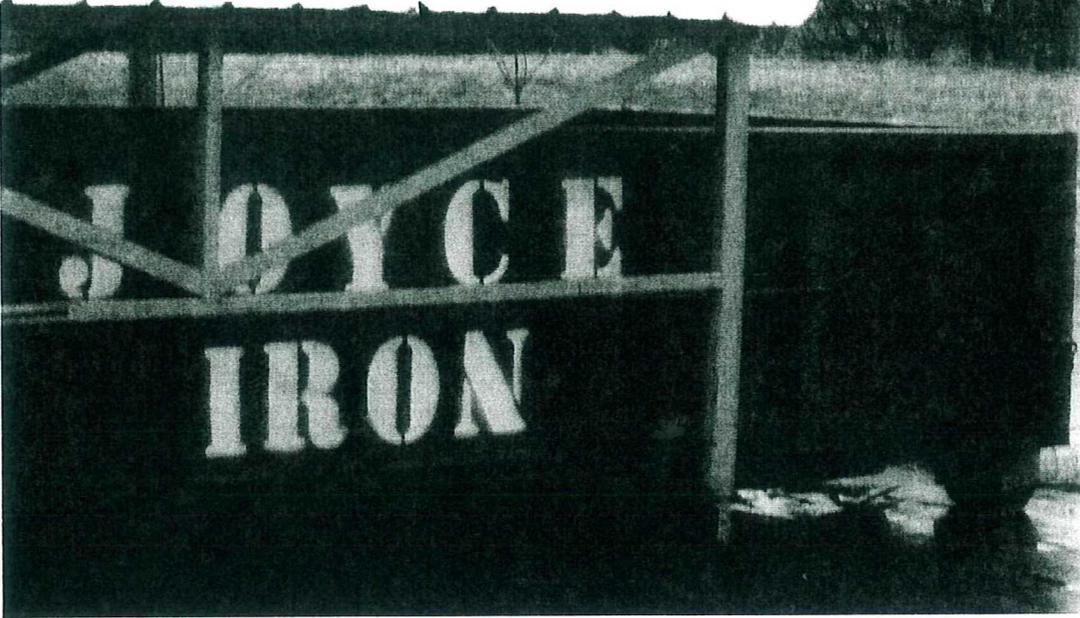
Gregory L. Sanders
Environmental Specialist
Division of Surface Water
Central District Office

Enclosure

c: Jeff Bohne, DSW/CDO
Scott Shields, City of Columbus, DOSD
Jim Carpenter, City of Columbus, DOSD

GS/nsm Daifuku America Corp-NOE, March 9, 2011

Daifuku America Corporation
Uncovered dumpster
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders





Daifuku America Corporation
Paint material handling equipment
Note paint chips on pavement
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders

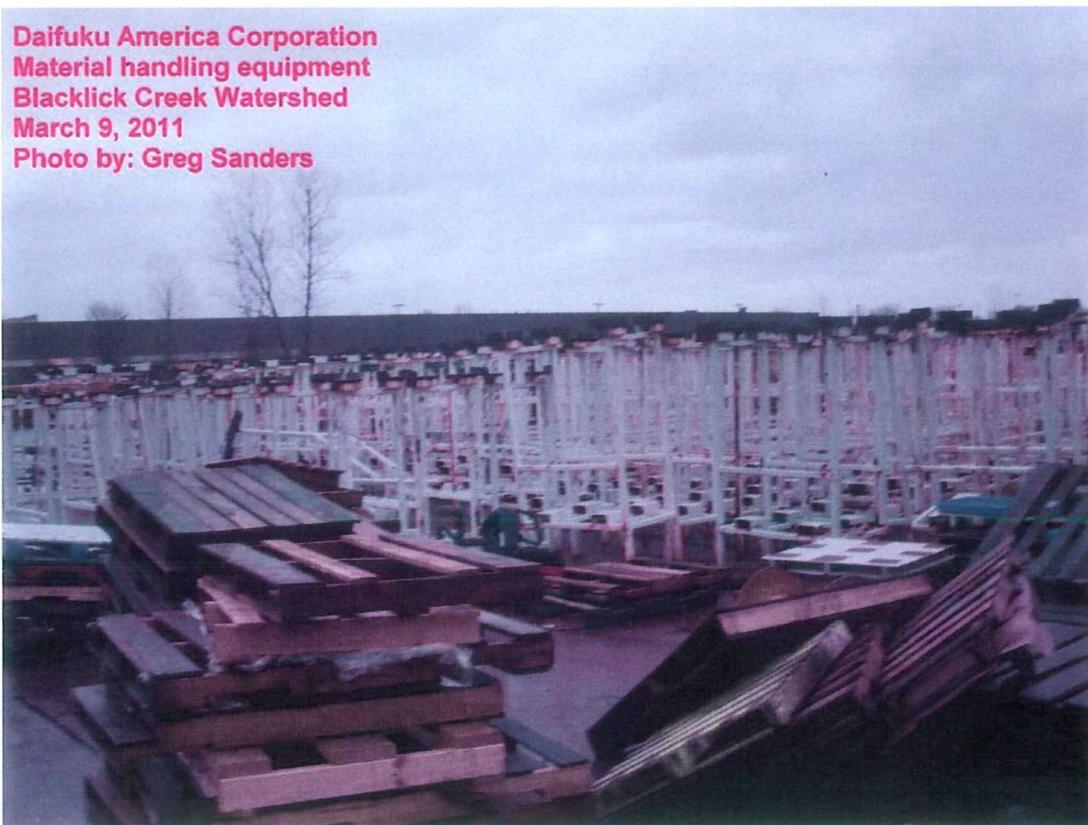


Daifuku America Corporation
Paint material handling equipment
Note paint chips on pavement
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders

Daifuku America Corporation
Material handling equipment
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders



Daifuku America Corporation
Material handling equipment
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders



Daifuku America Corporation
Uncovered dumpster
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders



Daifuku America Corporation
Uncovered dumpster
Blacklick Creek Watershed
March 9, 2011
Photo by: Greg Sanders

