

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

November 14, 2011

RE: WAYNE COUNTY  
QUALITYCASTINGS COMPANY  
NPDES # 3IN00310

Mr. Steven Steiner  
Safety and Environmental Coordinator  
1200 North Main Street  
Orrville, OH 44667

Dear Mr. Steiner:

On November 9, 2011, Dan Bogoevski and this writer conducted a storm water inspection of the Quality Castings Company. You represented the facility during the inspections. Parts VI, V and VI of your NPDES permit for your facility cover the storm water requirements.

Our inspection of the facility revealed that there are a number of areas of concern where pollutants are exposed to storm water. Although you have installed hydrodynamic separators within the storm sewer systems that service the southern portion of the facility, improvements in the implementation of best management practices (BMPs) contained in your storm water pollution prevention plan (SWP3) are required. Storm water monitoring data indicates that total suspended solids (TSS) have exceeded the limits contained in your NPDES permit on several occasions within the past year.

We noted the following areas of concern:

- Dust and sands from foundry operations are being tracked outdoors by front-end loaders and other such equipment. In addition, this equipment is used to transfer foundry sands from one part of the facility to another. Foundry sand is spilled onto the ground in the process. Improvements in good housekeeping practices, i.e., sweeping, and employee training can address these concerns. In addition, storm drains within primary haul roads can be retrofitted with inserts to trap sands, there may be different equipment more suited to transferring sands without spillage, and outdoor storage areas for castings can be kept neat and orderly to allow sweepers to do a better job.
- A number of castings that are stored outdoors still are partially coated with foundry sand. The storage area is not under roof and no cover, such as a tarp, is provided. Please review where such castings are stored. There are several outdoor areas with overhangs that may be a better location to store such castings. If castings must be stored where they are exposed to storm water, they should be covered with a tarp once castings are cooled to prevent storm water from contacting sand and conveying it to storm drainage systems.

- Return sand is stored in a silo within the main production building. However, when the silo fills with foundry sand, it is designed to overflow outdoors onto the ground. This overflow is an emergency feature of the return sand storage system and is not intended to be a routine manner of managing return sand. This concern can be addressed by installing an additional storage for return sand, i.e., an additional silo, or directing overflow sand into a watertight bin or other such container rather than onto the ground.
- Front-end loaders awaiting repair are stored outdoors. These vehicles often leak fluids (see photos) onto the ground where storm water will convey them into the drainage system. This concern can be addressed by storing vehicles with leaks indoors or placing drip pans under leaking vehicles.
- Spills were observed on the ground around the diesel fuel tank. Spills must be cleaned up immediately. Employee training on spill response procedures, making a spill kit available at the fuel tank, overseeing fuel delivery, equipping the tank with an automatic shut-off valve and placing the fuel tank in secondary containment are all practices which can address this concern.
- There are dumpsters and drums containing scrap metal stored outdoors. Scrap metal and old equipment that is no longer useful to you in your manufacturing process should be taken to a scrap yard on a regular basis so it does not accumulate for long periods of time in your yard. Scrap stored in dumpsters and drums should be covered with a tarp or lid.
- No BMPs have been implemented within loading docks. Drains within the docks should be cleaned to remove materials which have caused them to plug or where drainage is impeded. Drains can be equipped with valves or pig mats can be placed over drains when deliveries are made to prevent the discharge of pollutants during loading/unloading operations. In addition, the facility has not conducted an adequate investigation to determine where drains from loading docks are directed. Measures such as smoke and dye testing or sewer cameras can be used to determine where drainage systems discharge and the SWP3 must be updated accordingly.
- The SWP3 has not been updated to indicate the drainage systems and BMPs for the buildings on the north side of the facility that were acquired several years ago and now are used as warehousing and painting facilities. The SWP3 is to be

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updated at least annually as part of the Comprehensive Site Compliance Evaluation. Please update the SWP3 as needed for these additional areas of industrial activity.

Additionally, the draft NPDES permit was discussed. Attached is the draft which includes the updates and changes we discussed during the inspection. Please review the draft permit and forward any commits to my attention.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1255.

Respectfully,

A handwritten signature in black ink, appearing to read "Todd Surrena". The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd Surrena  
Engineering Geologist  
Division of Surface Water

TMS/cs

File: Industrial/Quality Casting Company