



**Environmental
Protection Agency**

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

Re: Lucas County
Peterson Spring
Industrial
Storm Water

November 30, 2011

Ms. Nancy Adkins
Quality Specialist/Management Representative
Peterson Spring
1625 Commerce Road
Holland, Ohio 43528

Dear Ms. Adkins:

I apologize for the delay in this letter. On August 10, 2011, I inspected Peterson Spring-Maumee Plant, located at 1625 Commerce Road, Spencer Township (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. 2GR01497. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures wire springs from purchased wire. It has a primary SIC code of 3495. NPDES permit coverage was granted in 2007. Industrial activities with potential exposure of pollutants to storm water include: material transfer to and from the garbage dumpsters (had lids); material transfer and outside storage of the scrap metal roll-off box; air pollution control equipment (filter system with material collected in a drum, below the outside unit); and the outside storage of wood pallets and metal racks (a.k.a. "hat racks").
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 pertaining 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.

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3. There did not appear to be any discharges from the facility's storm sewers at the time of my visit. Facility sampling is not required under the current permit and has not been performed. However, routine monitoring will be required under the MSGP. At this time, 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. A Storm Water Pollution Prevention Plan (SWP3) was available onsite. It was last revised July 11, 2011. The SWP3 included a Pollution Prevention Team but needs to describe each member's responsibilities as it relates to SWP3 implementation. The SWP3 also included: a site map; Preventative Maintenance; a Spill Prevention and Response Plan; Inspections; Employee Training; and Sediment and Erosion Controls. I commend Peterson's efforts to reinforce Spill Training by giving employees impromptu spill scenarios and assessing their response. The site map did not appear completely accurate and lacked sufficient detail. The location of each outfall and its drainage area was unclear as the catch basins on the east side of the building had pipes that were not shown on the site map. The hat racks and pallets that were stored outside and not under cover were not shown on the site map. The air pollution control equipment was not labeled on the map. *The missing details are a violation of Part IV.D. of the permit.*

Peterson needs to verify storm sewer locations and drainage areas. Also, they need to verify if the drainage and storm sewers north of the building and the storm sewer along Commerce Drive go to the pond. Inspection reports need to include specific observations of the outfalls and any discharges, when the last measurable precipitation event occurred, and the size of the event.

Please remember when revising the SWP3 that any report or document created for the permit must include the certification statement and be signed in accordance with Part VII.G. of the permit. This includes the inspection reports and annual Comprehensive Site Compliance Evaluation.

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:

5. Good Housekeeping - This item requires BMPs that result in the maintenance of a clean, orderly facility. There were various metal pieces and some plastic bottles on the ground by the metal scrap roll-off box on the northeast side of the building. Some metal "clips" were scattered on the ground just north of the covered storage area (next to the number "28" on the facility site map). *This is a violation of Part IV. D.3.a. of the permit.* Increased visual monitoring and sweeping is recommended for these areas.
6. Non-Storm Water Discharge Certification –The permit requires the SWP3 to contain a certification that the discharge has been tested or evaluated for the presence for non-storm water discharges. A Non-Storm Water Discharge Certification was included but not signed. *This is a violation of Part IV.D.3. g. of the permit.*

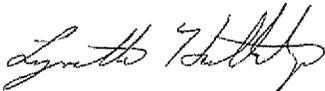
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7. Employee Training -- The permit requires training programs that shall inform personnel at all levels of the components and goals of the SWP3. Training should address topics such as spill response, good housekeeping and material management practices. The SWP3 shall identify periodic dates for such training. Peterson requires SPCC training annually. You indicated that the company intends to change their procedures to training everyone annually. The draft Multi-Sector General Permit will 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).

I reviewed training documentation for September 13, 2010, which included employee signatures, training date, and topics. It appeared acceptable.

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. Your response should include the dates, either actual or proposed, for the completion of the actions. It must also include a written certification that the requested changes to the SWP3 have been made. 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

/jlm

pc: Inspection Tracking File