



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

February 9, 2012

RE: TIMKEN/CANTON
STORMWATER INSPECTION
STARK COUNTY

Mr. Dominic Nardis
Manager – EH&S Auditing
The Timken Company
Mail Code - GNE-24
1835 Dueber Ave, SW
P.O. Box 6927
Canton, OH 44706-0927

Dear Mr. Nardis:

On February 2, 2012, this writer met with you and Dan Lake, Timken, to discuss storm water permitting issues at Timken as they relate to the new Multisector General Stormwater Permit (MSGP). After the meeting in your office, we inspected all the stormwater outfalls known to exist at the Canton plant. A summary of the meeting and inspection is presented below:

Permitting Issues

Timken's Individual National Pollutant Discharge Elimination System (NPDES) Permit No. 3ID00021 does not provide coverage for storm water. Timken has historically maintained coverage under Industrial General Stormwater Permit. This permit has been replaced with the issuance of the new MSGP effective January 1, 2012.

Manufacturing consists of the production of specialty alloy, steel and tapered roller bearing and components with a primary Standard Industrial Classification (SIC) code of 3312. Under the MSGP, Timken falls into the Primary Metals Sector F Subsector F1. In addition, Timken operates a scrap facility on site and as a co-located facility is subject to the Scrap Recycling and Waste Recycling Facilities, Sector N. The conditions specified in these sections are applicable in addition to the general requirements of the MSGP.

We discussed what constitutes a storm water outfall. In essence, it is a pipe or some other conveyance of storm water to waters of the state of Ohio. It cannot be located in-stream. If the outfall is not accessible, then an attempt must be made to establish this station upstream at the first available location. Care should be taken when selecting this location to locate the point where there are non-Timken related influences.

In the past, Timken maintained separate general storm water permits for each operation. We discussed the possibility of Timken filing one Notice of Intent (NOI) that would encompass all four mills as well as the Scrap Yard. This is encouraged to eliminate confusion and the need to track multiple permits for the same facility. The historic permits would not be renewed and will be automatically terminated.

Timken has been monitoring storm water outfalls 020, 024, and 029 and has gathered quite a bit of analytical data on the storm water discharge from them. These stations were selected as representative outfalls as there are numerous "substantially identical" outfalls on this 1200 acre site. This was allowed under the previous permit as it is with the new MSGP. Outfall 020 is the discharge to Petros Lake and its watershed is the Faircrest plant which also encompasses steel laydown areas constructed of slag and asphalt. Outfall 024 represents the discharge from the laydown yard north of the AGA Gas Plant. Outfall 029 represents the only point source discharge to Hurford Run from the scrap yard.

We discussed the effect of listing all the storm water discharges on the NOI form. I have learned that you do need to list all the outfalls. You will be able to keep the numbering sequence that has been historically assigned to the respective outfalls. When reporting the results, you will take the result from the representative outfall and report the same number for each "substantially identical outfall.

Outfall Inspection

We toured all the outfalls and were able to identify several obvious stations that did not meet the definition of "final point source discharge to waters of the State." Some were stations that were upstream of other legitimate stations and others were stations located in waters of the State. These do not need to be included in the NOI or within the Storm Water Pollution Prevention Plan (SWPPP) as it only adds confusion.

During the inspection, we noted an oil sheen on Hurford Run. After inspecting Hurford Run at several locations we finally determined that the sheen was emanating from outfall 029. As previously mentioned, this is the final discharge from 029. You indicated that a sample would be taken for Oil/Grease, pH, and flow. This is a violation of your storm water permit as it violates Ohio Administrative Code 3745-1-04 (B). You indicated that this incident will be followed up with the testing results and a written notification of non-compliance.

Street sweeping along the internal roadway which connects the Faircrest Plant and the Gambrinus plants has deposited a "berm" of debris adjacent to the roadway which is also located adjacent to Hurford Run. Several areas were noted where erosion is washing this debris into the stream. The street sweepings should be removed when a noticeable amount has accumulated or use another street sweeper that vacuums instead of pushing the debris to the side.

Timken has historically been proactive in terms of identifying storm water issues and instituting practices (Best Management Practices) to reduce possible contaminants in the storm water discharge. It has been noted that over the years the many improvements made to reduce the possibility of contaminated storm water runoff, such as inlet protection, piping high risk storm drains to the treatment facility and mandatory routine outfall inspections by plant personnel.

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I hope that this is an accurate account of the inspection. Please let me know if there are any inaccuracies. If you should have any questions, feel free to contact this writer at (330) 963-1136 or by e-mail at phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/cs

cc: Dan Lake, Timken Company

File: Industrial Permit/Compliance