



Environmental  
Protection Agency

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

July 17, 2012

Ms. Lisa Silva, P.E.  
Environmental Engineering Supervisor  
Navistar, Inc.  
6125 Urbana Road  
Springfield, Ohio 45502

**RE: Industrial Storm Water Site Inspection, NPDES Permit # 1GR00289\*EG**

Dear Ms. Silva:

On Monday, July 9, 2012, I inspected Navistar's Springfield plant to determine compliance with its' Industrial Storm Water Discharge Permit. Evan Cadwallader, a summer intern in Ohio EPA's Storm Water Program, accompanied me during this inspection. You represented the company during this review.

Based on my observations of the site's operations and a review of relevant documents, it appears the facility is in substantial compliance with the terms of its general industrial storm water discharge permit.

Because storm water runoff could be potentially regulated by two different NPDES permits, the site has options to consider going forward with respect to these requirements.

1. The site could keep its coverage under the industrial Multi-Sector General Permit (MSGP), and remove the proposed storm water language in the draft NPDES permit renewal.
2. The company could keep its coverage under the MSGP until the individual NPDES permit (which includes storm water language) is renewed. Then it could terminate coverage under the MSGP.
3. The company could keep its coverage under the industrial MSGP as well as pertinent language in its individual NPDES permit.
4. The company could self-certify that it meets the conditions of no exposure, and after submitting the appropriate information, the MSGP could be terminated. Storm water management requirements contained in the individual NPDES permit, which is expected to be renewed this September, could also be removed, though doing so would necessitate a permit modification request from Navistar.

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If Navistar decides to pursue the no exposure option, certification can be done by answering "no" to each of the 11 questions in the "exposure checklist" at the top of page 2 of the no exposure certification form, which is available at the following web link:

[http://www.epa.ohio.gov/portals/35/storm/no\\_exposure\\_certification\\_fis.pdf](http://www.epa.ohio.gov/portals/35/storm/no_exposure_certification_fis.pdf)

If you have any questions related to this inspection, or about any of the administrative aspects of terminating coverage under the Multi-Sector General Permit (MSGP), I can be contacted at (937) 285-6442, or via email at [chris.cotton@epa.ohio.gov](mailto:chris.cotton@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cotton". The signature is fluid and cursive, with the first name "Chris" and last name "Cotton" clearly distinguishable.

Chris Cotton  
Environmental Specialist II  
Division of Surface Water

cc: Matt Walbridge, OEPA/SWDO/DSW  
OEPA/SWDO/DSW Files

CC\bp