

August 17, 2012

Ms. Peggy Snyder
Trutec Industries
4700 Gateway Blvd.
Springfield, Ohio 45502

**RE: Storm Water Associated with Industrial Activity
Industrial Storm Water Compliance Evaluation Inspection
NPDES No. OHR000005/1GR00688*EG**

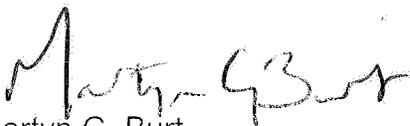
Dear Ms. Snyder:

On July 27, 2012, Sandra Leibfritz conducted an inspection at Trutec Industries located at 4700 Gateway Boulevard, Springfield, Ohio. You and Mike Smith represented the facility. Details on the inspection may be obtained from the enclosed inspection report.

The most current version of the Industrial Storm Water General Permit is NPDES No. OHR000005. This permit became effective on January 1, 2012 and varies significantly from the previous version (NPDES No. OHR000004). We recommend that you familiarize yourself with this new permit and update your Storm Water Pollution Prevention Plan to comply with the new permit terms and conditions. A copy of this permit (No. OHR000005) may be obtained at the following link: http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

There are four items requiring a response. No later than September 17, 2012, we ask for a written response on the action(s) that have, or will be taken, to address these four items. If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,



Martyn G. Burt
Environmental Supervisor
Division of Surface Water

cc: Clark County Health Department

MGB/bjc

Industrial Storm Water Reconnaissance Inspection

Name of facility: **Trutec Industries**

Address: **4700 Gateway Blvd Springfield, Ohio 45502**

Permit Number: **1GR00688*EG** Applicable Permit Sector; **8.F.5**

Date of visit: **July 27, 2012** Time started:; **10:00 a.m.** Time ended: **11:50 a.m.**

Facility representative(s): **Peggy Snyder**

OEPA inspector: **Sandra D. Leibfritz**

SWP3:

A. Did the facility representative produce an SWP3?

Yes, the SWP3 plan was updated in March 2012.

A1. Did it include a site map? **No.**

A2. Did it include schedules and procedures for the quarterly routine facility inspections?

Yes. However, weekly inspections are conducted.

A3. Did it include schedules and procedures for the comprehensive annual facility inspection?

Yes. The entire facility is inspected on a weekly basis

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges?

No. However, the outfall is visually inspected on a weekly basis, but a sample is not assessed for water characteristics listed in Section 4.2.1 (page 19) and documented as per Section 4.2.2 (page 19 and 20).

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?

N/A. Trutec's SIC code is 3398 (Primary Metals). According to Section 8.F.5 for NPDES No. OHR000005, benchmark monitoring is not required.

Comments:

Trutec provides heat treatment (e.g., carburizing, isonite, neutral hardening, etc.) for automotive parts and to a lesser extent to other industry.

Inspection Records:

B. Were inspection records available?

Yes. The inspection records are stored on a spreadsheet. These records are backed up off-site by a third party.

Comments:

Site Observations:

C. Are materials stored exposed to weather? If Yes, list materials.

Yes. The roll-off container containing scrap metal is not covered and the container is not water-tight. This roll-off container is located on the east side of the building.

D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens.

Yes. There are 3 catch basins on the east side of the plant. There are inlet filters on each of these catch basins. Oil coolers are surrounded by a concrete dike.

E. Number of outfalls from site/number inspected:

There is one outfall from this site that eventually drains to a retention pond for the industrial park and ultimately to an unnamed tributary of the North Fork Little Miami River. There was storm water beneath the outfall from a recent rain event. The water was clear and no sheen on the surface.

G. Did any show evidence of pollutants discharged in the storm water? **No**
If yes, describe;

H. Other observations/comments;

Floor drains and loading/unloading trench drains are directed to Trutec's wastewater treatment plant that discharges to Springfield's sanitary sewer collection system.

Skids with oil residual are stored inside. Oil totes are stored inside.

Chemical storage is inside. Hazardous waste is stored in a containment building.

There are 2 air cooling towers and 1 closed loop cooling tower. Both Mike Smith (maintenance) and Peggy Snyder reported that there is no discharge from any of these cooling towers including blowdown. Please be advised that cooling water and blowdown is not covered by this storm water permit.

Areas Requiring a Response

No later than September 14, 2012, we ask for a written response on the action(s) that have, or will be taken, to address these four items.

1. **Site Map.** Trutec did not have a site map in their SWP3 as required by Section Site 5.1.2 (page 23 of NPDES No. OHR000005). Trutec's SWP3 must be updated to include a site map.
2. **Inspections.** Weekly inspections are conducted and recorded in a spreadsheet. During the inspection, Ms. Leibfritz observed that the cells to the spreadsheet did contain the user id information; however, the spreadsheet that you sent to this office did not have the user id information, time of inspection and weather information as required by Section 4.1.2 as required by Section 4.1.2 (page 18 of NPDES No. OHR000005). Trutec must update the inspection form to include the information that is required by this section.
3. **Quarterly Visual Assessments.** The outfall area is visually inspected on a weekly basis, but a sample is not assessed for water characteristics listed in Section 4.2.1 (page 19) and documented as per Section 4.2.2 (page 19 and 20 of NPDES No. OHR000005). Trutec must revise the inspection form to include a quarterly visual assessment that is required by this section.
4. **Site Observations.** Trutec has one roll-off container that contains scrap metal. The roll-off box was not covered and was not water-tight. Trutec must implement Control Measures/Best Management Practices that minimize the exposure of the scrap metal. This may be accomplished by using a water-tight container and covering it (or equivalent).