



Environmental  
Protection Agency

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

August 22, 2012

Mr. Hal Kaufman  
Green Tokai Co., Ltd.  
55 Robert Wright Drive  
Brookville, OH 45309

**RE: Montgomery County, Green Tokai Co., Ltd., Industrial Storm Water  
Compliance Evaluation Inspection**

Dear Mr. Kauffman,

On August 15, 2012, I conducted an Industrial Storm Water Compliance Evaluation Inspection at Green Tokai Co., Ltd. (NPDES Permit – OHR000005; OEPA Permit – 1GR00471\*EG) located at 55 Robert Wright Drive in Brookville, OH. Representing the facility was you, Ms. Kelli Todd and Mr. Robert Basl (EHS Technology Group, LLC).

I have included with this letter, a copy of the inspection report for your use. I encourage you to review the inspection report and address the opportunities for improvement identified in the report.

If you have any questions regarding this report, please feel free to contact me at (937) 285-6107 or via email at [robert.ostendorf@epa.ohio.gov](mailto:robert.ostendorf@epa.ohio.gov).

Sincerely,

Bob Ostendorf Jr.  
Environmental Specialist  
Division of Surface Water  
Permits Section

BOJ/ff

Enclosure

Industrial Storm Water  
Compliance Evaluation Inspection

Name of facility: Green Tokai Co. Ltd.  
Address: 55 Robert Wright Drive  
Brookville, OH

Permit number: 1GR00610\*EG

Applicable permit sector: Y – Rubber, Miscellaneous Plastic Products, and Miscellaneous  
Manufacturing Industries

Date of visit: 8/15/12 Time started: 9:10 a.m. Time ended: 10:30 a.m.

Facility representative(s): Mr. Hal Kauffman – Senior Manager  
Ms. Kelli Todd – Human Resource  
Manager, Mr. Robert Basl – EHS Technology Group

OEPA inspector: Bob Ostendorf Jr.

SWP3:

- A. Did the facility representative produce an SWP3? **Y / N / Not requested**
- A1. Did it include a site map? **Y / N**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y / N**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y / N**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **Y / N**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **Y / N / NA**

Comments:

The SWP3 was revised in June of 2012. The site map for the facility was included in the SWP3 but some of the outfalls were not identified. The site plan and inspection forms will need to be updated.

Inspection records:

- B. Were inspection records available? **Y/N**

Comments:

The facility has historically performed inspections of the outside storage area on a weekly basis. Inspection records are kept for a period of 5 years.

Industrial Storm Water  
Compliance Evaluation Inspection

Site Observations:

- C. Are materials stored exposed to weather?

Y/N.

If Yes, list materials.

Trash – stored in a compactor.

Scrap Metal – stored in an uncovered roll-off box.

Used oil – stored in a covered area.

Metal racks – stored outside in the rear of the facility adjacent to the bike path.

- 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.

Y / N / Not sure

Facility has four outfalls and one outfall flows through a grassed area which would serve as a filter strip.

- E. Number of outfalls from site/number inspected:

4 / 4

- G. Did any show evidence of pollutants discharged in the storm water? Y / N

If yes, describe:

- H. Other observations/comments:

The following observations were made during the inspection and will need to be addressed by the facility:

1. Evidence of a hydraulic leak near the truck dock on the east side of the building.
2. Evidence of a hydraulic leak near the trash compactor.
3. Small amount of glass beads potentially from an oven in the drive on the south side of the building.
4. Excessive amount of dust near the uncovered roll-off box used for the collection of scrap product and located near the trash compactor.
5. The uncovered roll-off box used for the collection of scrap metal was leaking water (dripping) onto the pavement. There was staining present on the pavement which indicates that this situation may have been present for some time.
6. It was noted during the inspection that the blow-down from the cooling tower discharged to the sanitary sewer. The facility also has chillers on site that use a glycol product. It was noted that if the facility experienced a catastrophic event which caused the release of the glycol from the chillers, the glycol would likely reach the storm drain.