



Environmental
Protection Agency

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

September 12, 2012

Mr. Kendall Nicodemus
TrueCut Tools Company
10153 Detrick-Jordan Road
New Carlisle, Ohio 45344

**RE: Proposed Building Expansion – Sewage Evaluation
Industrial Storm Water Compliance Evaluation Inspection
NPDES Permit Number Pending**

Dear Mr. Nicodemus:

On September 4, 2012, Ms. Leibfritz inspected TrueCut Tools located at 10153 Detrick-Jordan Road, New Carlisle to evaluate the existing on-site sewage system and the storm water requirements. You, Larry, Chad, Scott and Zane Nicodemus were representing the facility. Your contractor, James Miller, was also present.

The existing sewage system is a septic tank to an unknown leaching system. It is believed to be a leaching bed. The current location is under a building addition (concrete floor) that occurred in 2005 to 2007. There are approximately 19 employees with no plans to increase the number of employees with the building expansion. Due to the location under the concrete floor, this sewage system is in need of replacement. The sewage generated by your 19 employees is less than and 1,000 gallons per day and is categorized as a small flow on-site sewage treatment system (SFOSTS). Approval for your new sewage system must be obtained from the Clark County Health Department.

During the inspection, Ms. Leibfritz observed milky-white mop water in the shop area. Mop water from your type of operation can be contaminated with oils and lubricants. Ms. Leibfritz was informed that mop water is disposed of in the sewage system and sometimes it is hauled off site by Heritage-Crystal Clean. Mop water is process wastewater and must be recycled or disposed of by Heritage-Crystal Clean or the equivalent instead of disposal in your sewage system.

TrueCut Tools is a machine shop with an SIC code of 3599. This SIC code requires you to obtain coverage under the general permit for Storm Water Discharges Associated with Industrial Activity (NPDES No. OHR000005) *or* to apply for an exclusion by submitting a "No Exposure Certification" form. You were unaware of this requirement; however, on the day of the inspection there were no industrial activities or materials exposed to the elements. After the inspection, you did complete the No

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Exposure Certification form for submittal to Ohio EPA's Central Office. It appears that your "No Exposure" is valid.

If TrueCut Tool's operation changes so that industrial activities or materials become exposed to the elements, then coverage under an Industrial Storm Water General Permit must be obtained immediately. This can be done by submitting a completed Notice of Intent (NOI) form, along with required fee, to Ohio EPA. The NOI form can be accessed at the following web link:

http://www.epa.ohio.gov/portals/35/storm/Industrial_NOI_Form.pdf

Instructions for completing the NOI, and the address to which it must be sent, can be found at:

http://www.epa.ohio.gov/portals/35/documents/NOI_instructions2_s.pdf

Please be advised that the No Exposure Certification form must be submitted to Ohio EPA at least once every five years. If you have any questions about the inspection or this letter please contact Sandra Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,



Martyn G. Burt
Environmental Supervisor
Division of Surface Water

MGB/tf

cc: Clark County Combined Health District

Site Check list: Industrial Storm Water No Exposure Verification

Facility: **TrueCut Tools**

Inspector: **Sandra D. Leibfritz**

Date: **September 4, 2012**

Item	yes	no	N/A	location on site; nature of the materials/activities.
Materials stored outside?		x		
Are they exposed to the elements?			x	
Can materials be mobilized by rain?			x	
Containers stored outside?		x		
Are they exposed to the elements?			x	
Is there evidence of container deterioration?			x	
Are there storm drain inlets in or near loading docks?		x		
Are materials transferred outside?		x		
Are the transfer areas exposed to the elements?			x	
Any evidence of materials getting into storm catch basins?		x		
Do roof vents or air pollution control devices discharge pollutants which can get carried into drains?		x		Baghouse vents to the inside of the building.
Are dumpsters left open?			x	All trash is stored inside in trash cans. The facility does not have a dumpster.
Are there leaking dumpsters?			x	
Is there machinery (idle or working) outside?		x		
Is machinery leaking fluids?			x	
Is there evidence of pollutants being discharged from facility outfalls?		x		

General Comments:

TrueCut Tools is proposing to build an addition to their existing shop. There are approximately 19 employees. There are no immediate plans to add additional employees.

Ohio EPA issued PTI (No. 05-14062) on October 5, 2005 for a mound system. This system was never installed. Because this is classified as a small flow on-site sewage treatment system (SFOSTS), TrueCut will be required to obtain a sewage permit from the Clark County Health Department.

There is a residential home on the property. The home water well is shared with the business. Any regulatory issues regarding the water well will need to be addressed by Clark County Health Department. Currently, the backwash from the water softener is disposed of in the existing sewage disposal system.

TrueCut Tools is a machine shop with SIC code of 3599.

There was one floor drain in the original part of the building. The floor drain was plugged.

Machines are oil cooled.

Heritage-Crystal Clean picks up all oils/lubricants and solvents (parts cleaner). Drip pans are placed under the machines. All oils/lubricants are stored inside.

Grinding and cutting is performed at the shop. Small metal shavings from the grinding operation are collected and passed through a baghouse. The baghouse vents to the inside of the building. The metal shavings and other scrap metal is stored inside and is recycled or disposed of in the trash. Bar stock metal is also stored inside.