



**Environmental  
Protection Agency**

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

**Re: Notice of Violation**  
Putnam County  
Industrial Storm Water  
Acme Machine Automatics  
Facility ID No. 2GR01715

September 25, 2012

Mr. Mike VanBuskirk, Plant Supervisor  
Global Precision Parts, Inc.  
111 Progressive Drive  
Ottoville, Ohio 43571

Dear Mr. VanBuskirk:

On September 21, 2011, Ryan Gierhart and I inspected Acme Machine Automatics, located at 111 Progressive Drive, Ottoville (photos taken). The purpose of our visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity (a.k.a. Multi-Sector General Permit, or MSGP). Authorization to discharge under the MSGP was granted April 1, 2012. You and Mark Kill (Global Precision Parts) were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures precision metal parts. It has a primary SIC code of 3451, Screw Machine Products. Industrial activities with potential exposure of pollutants to storm water include: material transfer to the garbage dumpster (had lid); outside storage of parts containers; material loading and unloading activities at loading bay/truck dock in the event of a spill; and tracking/transport of particulates from the chip hopper storage area (lean-to on the north side of the building).
2. A Storm Water Pollution Prevention Plan (SWP3) was not available. *Failure to develop and implement an SWP3 is a violation of Section 5 of the permit.* An SWP3 must be developed. Details on the required contents of an SWP3 can be found in the current permit at: [http://epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx). A template for developing an SWP3, sample record keeping forms, and a sample Annual Report form for the MSGP can also be found at the above web page. I recommend reviewing the MSGP. Sections 1 through 7 pertain to all facilities. Section 8 Subpart AA describes specific conditions and Best Management Practices (BMPs) required for your industry.
3. I did not observe any discharges during my inspection. Discharge monitoring is required by the permit and has not yet been performed. The following types of monitoring are required:
  - a. Quarterly Visual Assessment - A grab sample from each outfall (some exceptions are noted in the permit) must be taken each calendar quarter. Samples must be assessed for color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of pollution. *Failure to conduct and document quarterly visual assessments of your discharge is a violation of Sections 4.2.1 and 4.2.2 of the permit.* You must begin quarterly visual assessments immediately.

- b. **Benchmark Monitoring** – From your facility's date of authorization to discharge, you have three years to collect four quarterly benchmark grab samples of your discharges. The samples are to be analyzed in accordance with 40 CFR136 for the parameters listed in Section 8 under your facility's subsector(s). Each quarterly sample must represent a different quarter of the calendar year. Within 30 days of receipt of data from your lab, data must be submitted to Ohio EPA through the eDMR system. During year four, you must compare the average of your values against the benchmark value listed for your subsector in Section 8 of the permit. If the values exceed the benchmark, you must perform the actions under Section 6.2.1.2 of the permit.

For both types of monitoring, samples are to be collected within the first 30 minutes of discharge and on discharges that occur at least 72 hours from the previous discharge. Sampling must be conducted from each permitted outfall, unless you document in your SWP3 that you have met the conditions for one of the exceptions listed in the permit (inactive/unstaffed facility, substantially identical outfalls, etc.). Videos showing how to perform sampling may be viewed at: [http://epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx). Additional sampling guidance can be found at: [http://www.epa.gov/npdes/pubs/msgp\\_monitoring\\_guide.pdf](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf).

The NPDES permit requires that the SWP3 describe and ensure implementation of storm water controls. These controls must address several different components of facility operations that are listed in the permit. Storm water control implementation issues were noted for the following facility operations:

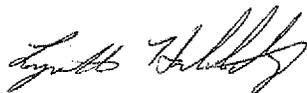
4. **Good Housekeeping** - This item requires BMPs that result in the maintenance of a clean, orderly facility. I observed a lot of orange staining and particulate matter that appeared to be rust inside the lean-to where metal chips are stored. The orange material on the ground extended outside of the lean-to and into the gravel parking area to the east. *This is a violation of Section Part 2.1.2.2 of the permit.* Increased visual monitoring and sweeping is recommended for this area.
5. **Preventive Maintenance** - The permit requires the inspection and maintenance of storm water management devices; the inspection and testing of facility equipment and systems to uncover conditions that could cause failures resulting in discharges of pollutants; and ensuring the appropriate maintenance of equipment and systems. I observed the catch basin by the office area had a large plant growing in it that took up the inside of the basin. This must be removed. The catch basin off the material storage area had gravel in the bottom. An outlet was not visible. Solids must be removed, especially prior to conducting monitoring. As required by Section 2.1.2.3 of the permit, please be sure to complete these maintenance items as soon as possible.
6. **Inspections** - The MSGP requires at least quarterly routine documented inspections of all areas of the facility where industrial activities or materials are exposed to storm water and of all storm water control measures used to comply with this permit. At least one inspection must occur when storm water is discharging from your site. Acme does not currently have a documented inspection procedure for storm water controls. *Failure to routinely inspect and document findings is a violation of Sections 4.1.1 and 4.1.2 of the permit.* You must begin quarterly routine inspections immediately.

Mr. Mike VanBuskirk  
September 25, 2012  
Page Three

7. Employee Training – The MSGP requires at least annual employee training of all employees who work in areas where industrial activities or materials are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g. inspectors, maintenance personnel). Employee training has not been conducted or documented. *This is a violation of Section 2.1.2.9 of the permit.* With your response to this letter, please provide a training schedule for your employees to meet this requirement.
  
8. Erosion and Sediment Controls - There was an area of bare soil south of the building. This needs to be stabilized. *The failure to stabilize exposed areas is a violation of Section 2.1.2.5. of the permit.*

Within 30 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the compliance issues. Your response should include the dates, either actual or proposed, for the completion of the actions. It must also include a written certification that an SWP3 has been developed. If there are any questions, please contact me at 419-373-3009 or [lynette.hablitzel@epa.state.oh.us](mailto:lynette.hablitzel@epa.state.oh.us).

Sincerely,



Lynette M. Hablitzel, P.E.  
Division of Surface Water  
Storm Water Section

/jlm

ec: Tracking