



**Environmental
Protection Agency**

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

Re: **Notice of Violation**
Putnam County
Production Products Inc.
Industrial Storm Water
Facility ID No. 2GR01561
Construction Storm Water
Facility ID No. 2GC03159*AG

September 28, 2012

Mr. Scott Stemen
Production Products Inc.
200 Sugar Grove Lane
Columbus Grove, Ohio 45875

Dear Mr. Stemen:

On September 21, 2012, Ryan Gierhart and I inspected Production Products Inc. (PPI), located at 200 Sugar Grove Lane, Columbus Grove (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 March 1, 2012. Roger Briem, Maintenance Manager, and Renee Guay, Corporate Environmental Engineer, were present to provide information. As a result of the inspection, I have the following comments:

1. The facility manufactures automotive parts. It has a primary SIC code of 3465, Automotive Stampings. Industrial activities with potential exposure of pollutants to storm water include: plastic and metal storage racks; trash compactor; uncovered Waste Management roll-off; and cardboard located outside.
2. A Storm Water Pollution Prevention Plan (SWP3) was available. Ms. Guay reported that it was in the process of being updated and, therefore, had not yet been signed. According to the permit, the SWP3 was to be updated by July 1, 2012. I received a September 17, 2012, e-mail from Ms. Guay with the electronic version. Based on information provided onsite and in the e-mailed SWP3, there appear to be some deficiencies. These include but are not limited to:
 - a. Pages 3, 10, 17, and 21 seem to refer to PPI as "FPC".
 - b. The site map did not show cardboard storage, manhole where samples are taken along with outfall numbers.
 - c. Page 20 indicates that employees receive training when new and, thereafter, only when there is a change in the facility or procedures. The SWP3 must make sure that annual employee training occurs.

- d. Page 13 discusses Routine Facility Inspections. Most of this language is taken directly from the permit and does not spell out the facility specific procedures, such as who at the facility is to conduct the inspection, the weather and a description of any discharges and the specific items covered by the inspection. Please see the sample inspection form at the website listed below.
- e. The schedule for regular pick-up and disposal of waste materials was not provided.
- f. While Page 21 states there are no non-storm water discharges, the SWP3 and inspection reports do not provide details about the evaluation process or the direct observations. Documentation must include the date of evaluation, the evaluation criteria, list of outfalls or onsite drainage points directly observed, different types of non-storm water discharges (Page 4 site map states "artesian wells at transfers" on the east side of the building), and any corrective actions.

The missing information is a violation of Section 5 of the permit. 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. A template for developing an SWP3, sample record keeping forms, including those of routine inspections, and a sample annual report form for the MSGP can also be found at the above web page. Please update the SWP3 within 30 days of the date on this letter. With your response to this letter, please provide a training schedule for your employees.

Also, the SWP3 states the facility has an SIC code of 3714; however, our records indicate that it is 3465. In your reply to this letter please verify the correct SIC code(s). If the SIC code(s) have changed, an updated NOI application must be submitted.

3. Discharge monitoring has been performed. Quarterly Visual Assessment and Benchmark Monitoring data from 3/12/2012 and 6/11/2012 were reviewed. The Benchmark Monitoring samples were analyzed for Total Aluminum, Total Zinc, Hardness and Nitrate Nitrite. Some issues were noted with the sampling:
 - a. The sample point is from the manhole near the retention pond. The manhole cover is stamped as a "sanitary" sewer; however, the water inside appeared clear. Please verify that this monitoring location is a separate storm sewer system.
 - b. The manhole apparently acts as a flow diversion chamber. It was reported that the retention pond has one pipe connected to the manhole, which functions as both an inlet and the sole outlet of the pond. It was also reported that the pond acts as surcharge point in the storm sewer system. Since flow may go in multiple directions through this manhole, the flow direction must be assessed and documented to verify that sample collection is representative of and occurs when the site is discharging.
 - c. The site map shows a storm sewer line north of the retention pond that runs from Building F to Sugar Grove Lane. This outfall must be monitored.

- d. The lab reports did not include records of the date and time of the previous storm event, timing between sample collection and start of discharge, and whether the sample was from snowmelt or runoff. Please insure you are documenting this information. 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.
- e. For the Quarterly Visual Assessment, the report must also describe the probable contaminant source. This was not included when Suspended Solids were identified on 3/12/2012.
- f. It is my understanding that the Benchmark Monitoring data has not yet been submitted to Ohio EPA. Within 30 days of receipt of data from your lab, data must be submitted to Ohio EPA through the eDMR system.

Failure to properly conduct and document monitoring is a violation of Sections 4.2 (Quarterly Visual) and 6.2 (Benchmark) of the permit. The sampling protocol must be revised within 30 days of the date on this letter to meet permit requirements. Videos showing how to perform sampling may be viewed at: 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.

4. During Year 4 of the permit, you must compare the averages of your Benchmark Monitoring data against the benchmark values listed for your subsector (AA1 for SIC 3465) 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. The table below shows the monitoring data to date:

Date	3/12/2012	6/11/2012	Benchmark
Total Aluminum (mg/l)	2.03	0.26	0.75
Total Zinc (mg/l)	0.240	0.354	0.13
Nitrate plus Nitrite (mg/l)	0.52	1.28	0.68

Several values exceeded the benchmark value listed in the permit. I suggest reviewing the selection, design, and implementation of your control measures as well as your sampling methods to prevent future sampling data from resulting in an average value that exceeds the benchmark.

5. Minimize Exposure – The MSGP requires that you minimize exposure of manufacturing, processing, and material storage areas to precipitation by either locating industrial activities and materials inside or protecting them with a storm resistant covering. PPI has made significant efforts to accomplish this. However, a Waste Management roll-off was uncovered. *This is violation of Section 2.1.2.1 of the permit.* Please be sure that roll-offs are placed completely under roof or provided a cover.

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6. Erosion and Sediment Controls - PPI has permit coverage under the NPDES general permit for storm water discharges associated with construction activities, Facility ID No. 2GC03159*AG. Our records indicate that Ferguson Construction and RD Jones Excavating are Co-Permittees on this project. There was a large soil stockpile on the east side of the facility. The pile was not stabilized and silt fence had not been placed on the east side of the pile, between US 224 and the pile. *Failure to stabilize within seven days any bare areas that remain idle for 21 days or more is a violation of Part III.G.2.b.i. of the permit. Failure to implement sediment controls to address all runoff is a violation of Part III.G.2.d. of the permit.* We are quickly approaching the end of the growing season. It is critical that all disturbed portions of the project be reviewed to determine which areas are likely to remain idle over winter so that they can be stabilized prior to the onset of winter weather. Stabilization should be initiated no later than October 31, 2011.

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 the SWP3 has been updated. If there are any questions, please contact me at (419-373-3009) or lynette.hablitzel@epa.state.oh.us.

Sincerely,



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

/jlm

ec: James Burkholder, Midway Products
Renee Guay, Midway Products
Tracking

pc: Ferguson Construction Company
RD Jones Excavating Inc.