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

November 29, 2012

Petermann LTD
Attn: Mr. John Hinners
8401 Hosbrook Road, Suite 330
Cincinnati, OH 45236

RE: Petermann LTD – Clinton County Facility
4425 SR 730-Building G, Wilmington, OH/ CEI Report
Industrial Storm Water Permit – Ohio EPA Facility Number 1GR01154*DG

Dear Mr. Hinners:

On November 28, 2012, I conducted a Compliance Evaluation Inspection (CEI) of the Petermann LTD, Clinton County facility located at the above-referenced address. The purpose of the inspection was to determine compliance with the Facility's industrial storm water National Pollutant Discharge Elimination System (NPDES) general permit. This Facility has a primary Standard Industrial Classification System (SIC) code of 4151 and is required to comply with the site-specific requirements of subsector P1 of the storm water permit, in addition to the general requirements. You were present during the inspection process, which included a review of the Storm Water Pollution Prevention Plan (SWP3) and a facility walk-through.

SWP3 Review

As noted in the attached Inspection Report, there were several items missing in the SWP3 site plan. There was no information pertaining to quarterly visual assessments of storm water discharges. Also, the section pertaining to annual comprehensive site inspections was not up-to-date.

During the inspection you mentioned that the SWP3 was updated in 2012, but the plan was not located on-site nor had the updated procedures been implemented. Petermann LTD must submit an updated Clinton County facility SWP3 to this office no later than December 31, 2012. By no later than January 31, 2013, all updated procedures must be fully implemented at the Clinton County facility.

Thank you for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6342 or by email at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

JJ/tb

Enclosure

Industrial Storm Water Compliance Evaluation Inspection

Name of facility: **Petermann LTD – Clinton County Facility**

Address: **4425 SR 730 – Building G, Wilmington, OH**

Permit number: **1GR01154*DG** Applicable permit sector: **P1**

Date of visit: **11/28/2012** Time started: **11:00 a.m.** Time ended: **12:00 p.m.**

Facility representative(s): **John Hinners, Environmental Manager (Cincinnati Office), Mary Bosier, General Manager of the Wilmington facility**

OEPA inspector: **Joshua Jackson**

SWP3:

A. Did the facility representative produce an SWP3? **Yes**

A1. Did it include a site map? **Yes, but the site map did not contain the following items required by the NPDES permit:**

The size of the property in acres; the size and location of significant structures and impervious surfaces; locations of all receiving waters in the immediate vicinity of the facility; location of all storm water conveyances including ditches, pipes, and swales; locations of all storm water monitoring points; locations of storm water outlets, with a unique identification code for each outfall.

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

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Yes, but the annual inspection, as it is prescribed in the facility's existing SWP3, is essentially another quarterly inspection. The annual inspection reports should include all items found in section 4.3 of the NPDES permit.**

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **No**

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

Inspection Records:

B. W ere inspection records available? **Yes. However, no visual assessment sampling was performed and the comprehensive site inspections were not completed according to the permit requirements.**

Site Observations:

C. Are materials stored exposed to weather? **No.**
Three above ground fuel storage tanks are located on the facility. There was no evidence of a past spill (staining).

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. **No.**

E. Numb er of outfalls from site/number inspected: **0**
There were two parking lot drains identified, but the SWP3 site map did not identify the storm water outlets. The updated SWP3 should include these outlets so that representative visual assessment sampling can be performed.

F. Did any show evidence of pollutants discharged in the storm water? **N/A.**

G. Other observations/comments:
Dried paint was observed on parking lot drain next to the building. It appeared that paint had been poured down the drain at some point in the past. Mr. Hinners stated that those conditions existed when Petermann LTD took over operations in 2010. He stated that they documented these conditions with photographs.

Mr. Hinners stated that all buses are either washed off-site or a contractor is brought in to wash the buses with a total recycle system.