



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

December 7, 2012

PJ Trailers
Attn: Mr. Kevin Wells, Safety Director
1807 FM 2352
Sumner, Texas 75486

**RE: PJ Trailers – Mt. Orab Facility – 200 Front Street/ CEI Report
Industrial Storm Water Permit – Ohio EPA Facility Number 1GR01153**

Dear Mr. Wells:

On December 5, 2012, I conducted a Compliance Evaluation Inspection (CEI) of the PJ Trailers – Mt. Orab facility (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 3715 and is required to comply with the site-specific requirements of subsector P1 of the storm water permit, in addition to the general requirements. Dwight Day, Rodney Gray and Lori Kastup 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

Even though this Facility had coverage under the previous permit, the company has not submitted an NOI for coverage under the *current* NPDES permit for storm water associated with industrial activities (effective January 1, 2012). Ohio EPA still has record of this Facility under the ownership of Carry-on Trailer LLC. However, it has been under the ownership of PJ Trailers since 2010.

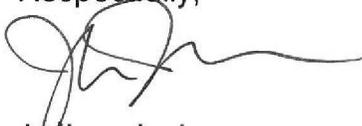
- By no later than January 15, 2013, PJ Trailers must submit a Notice of Intent (NOI) to provide the Mt. Orab Facility coverage under Ohio EPA general industrial NPDES permit for storm water. The NOI must be accompanied by a check made out to "Treasurer, State of Ohio" in the amount of \$350. NOI forms and instructions can be found at this web page <http://epa.ohio.gov/dsw/permits/gpfact.aspx>
- By no later than March 15, 2013, PJ Trailers must complete the update of the SWP3 for the Mt. Orab Facility and implement the best management practices, inspections and all other requirements. A copy of the SWP3 must be submitted to this office by the same date.

Observations Noted During the Site Inspection

- I recommended Facility staff periodically clean the storm drain catch basins so they can effectively remove solids from any storm water run-off. This best management practice should be part of the updated SWP3.
- Two above ground fuel storage tanks (diesel and gasoline) are located next to one of the buildings. Both tanks are located within secondary containment and a metal roof. They are also located within two feet of a storm water drain. I recommended moving the tanks away from the storm water drain in order to provide more distance between the tanks and the stream in the event of a spill.

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) 285-6029 or by electronic mail at joshua.jackson@epa.state.oh.us.

Respectfully,



Joshua Jackson
Environmental Specialist II
Division of Surface Water

JJ/tb

cc: Dwight Bay, PJ Trailers
Lori Kastup, PJ Trailers

INDUSTRIAL STORM WATER COMPLIANCE EVALUATION INSPECTION

Name of Facility: PJ Trailers – Mt. Orab, OH.

Address: 200 Front Street, Mt. Orab, OH 45154, Brown County

Permit Number: 1GR01153*DG Applicable Permit Sector: AB1

Date of visit: 11/7/2012 Time started: 10:30 a.m. Time ended: 11:45 a.m.

Facility Representative(s): Dwight Day – Asst. Plant Manager, Rodney Gray – Maintenance Mngr., Lori Kastup-Human Resources/Safety, Edgar Bustillos – Plant Manager (Not present)

OEPA Inspector: Joshua Jackson

SWP3:

- A. Did the Facility representative produce an SWP3? **Yes (outdated)**
 - A1. Did it include a site map? **Yes (outdated)**
 - 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**
 - A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? **Yes**
 - A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **N/A**

Inspection records:

- B. Were inspection records available? **No**

Comments: **There was no evidence that any quarterly or annual inspections were performed. It appears that once Mark Calhoun departed from the company, no employee continued the work on the storm water program.**

Site Observations:

- C. Are materials stored exposed to weather? **Yes**
If Yes, list materials.

Steel supply, two dumpsters of scrap metal, diesel and gas storage tanks.

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.

Catch basins in yard drains.

- D. Number of outfalls from site/number inspected: Site map did not include updated list of storm water outfalls. Verified one outfall during the inspection.
- E. Did any show evidence of pollutants discharged in the storm water? **No**
If yes, describe:

Other observations/comments;