



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

Re: Defiance County
Defiance Metal Products
Industrial Storm Water

February 12, 2013

Mr. John Bridenbaugh
Director of Information Systems
Defiance Metal Products
21 Seneca Street
P.O. Box 447
Defiance, Ohio 43512

Dear Mr. Bridenbaugh:

On January 24, 2013, a storm water compliance inspection was made of the Defiance Metal Products Facility located at 21 Seneca Street in the City of Defiance, Defiance County, and the Defiance Metal Products Facility located at 6728 State Route 66, Tiffin Township, Defiance County. These inspections were conducted to determine compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Industrial Activity (IGP) issued to this facility. The inspection consisted of a tour of each facility both inside and the grounds outside of the facility. A review of paperwork for the IGP was also made. The Seneca Street facility is a fabricated metal products plant covered under sector AA2 of the IGP and the State Route 66 facility is an industrial machinery plant covered under sector AB1 of the IGP. Mark Ankney, Maintenance Supervisor, and Brent Davis, Safety Leader, were both present for the inspection of the Seneca Street facility.

Seneca Street Facility: All outside catch basins go to a storm pond that discharges to the Maumee River. The drains on the recycle truck docks have shut off valves in case of a spill. Wood pallets are stored outside along with metal racks and dies. Dry scrap metal is stored in a roll off outside and the oil coated scrap metal is stored in roll offs under cover. Unused equipment is also stored under cover with the scrap metal. Hazardous waste and quarterly waste such as batteries and fluorescent light bulbs are stored in the building.

Most of the storm water goes through two oil water separators that discharge into a storm water pond located on the north side of the building. Some roof downspouts discharge directly into the storm pond. There was no discharge from the storm water pond at the time of the inspection. It was stated that the pond does not often discharge. The outside of the building appears to have good housekeeping with no spills, stains or debris noted.

The Storm Water Pollution Prevention Plan (SWP3) has been partially integrated into the facility's Integrated Contingency Plan (ICP). This has created a problem with being able to produce the SWP3 when requested. You should consider having an SWP3 that is a stand alone document. This could be an extensive chapter as a part of the ICP but is to be readily accessible and identifiable as the SWP3. When parts of the SWP3 are kept in different areas or parts are kept only on a computer data base, it is not readily accessible and may not be followed easily.

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Part 5.1 of the IGP contains the elements that are required in your SWP3. These include:

- A list of all members of your storm water pollution prevention team as well as their individual responsibilities.
- A site description of your facility including maps, storm water and other non-storm water discharges not authorized by an NPDES permit.
- Potential pollutant sources.
- Descriptions of control measures.
- Schedules and procedures including monitoring and inspections.
- Signature requirements. The IGP requires that the SWP3 be signed and dated in accordance with Appendix B, Subsection 11 of the IGP. This requires that a specific certification statement be included in the SWP3 (see B.11.E.).

Not all of the elements of the SWP3 that are required by the IGP were viewed during the inspection. I recommend that you review your SWP3 and make sure that it includes all the required elements and is readily accessible and identifiable.

The permit requires personnel at this facility to do quarterly visual assessments of the discharge and document these assessments. Personnel are also required to collect and analyze storm water samples according to Parts 6, 7, and 8 of the IGP. These benchmark samples are to be collected and analyzed within the first three years of the IGP.

State Route 66 Facility: All outside catch basins from this facility go to a storm water pond on the south side of the facility. There are pallets, plastics, and metal racks stored outside. Scrap metal that is clean and not oily is stored in roll offs outside. Some scrap metal pieces were observed around the roll off on the ground. This area needs to be regularly policed to make sure that scrap metal does not accumulate.

The SWP3 was not reviewed for this facility. You should also review this SWP3 to make sure that it includes all the required elements, as above, and is also readily accessible and identifiable. If you wish to have the SWP3 as part of the ICP, all parts should be kept as a separate chapter within the ICP.

Quarterly visual assessments of the discharge are also required at this facility. These assessments must be documented. Storm water samples are not required for this facility.

If you have any questions, you may contact me at (419) 373-3016 or by e-mail at patricia.tebbe@epa.ohio.gov.

Sincerely,



Patricia A. Tebbe, P.E.
Division of Surface Water

/jlm
ec: Tracking