



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

April 25, 2013

Mr. Robert VanGhle  
Superior Trim, Inc.  
5225 Prosperity Drive  
Springfield, OH 45502

**RE: Superior Trim – NPDES No. 1GR01163\*EG/OHR000005  
Compliance Evaluation Inspection – Clark County**

Dear Mr. VanGhle:

On April 22, 2013, Sandra Leibfritz conducted an inspection at Superior Trim located at 5225 Prosperity Drive Springfield, Ohio. Debra Butler-Peaks was representing the facility. Details on the inspection may be found in the enclosed inspection report.

There are 12 items requiring a response. You will need to revise your storm water pollution prevention plan to address some of these items. We ask for a written response to this office no later than May 31, 2013. Your response must include a description of the corrective measures taken or will be taken or proposed. Your response should include the dates, either actual or proposed for completion of the corrective measures.

If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,

Martyn G. Burt  
Environmental Supervisor  
Division of Surface Water

MB/kb

Enclosure

cc: Clark County Health Department

Industrial Storm Water Compliance Evaluation Inspection;

Name of facility; **Superior Trim, Inc.**

Address; **5225 Prosperity Drive  
Springfield, OH 45502**

Permit number; **1GR01163\*EG/OHR000005** Applicable permit sector; **AB & 8Y.2**

Permit Effective date: **January 1, 2012** Permit Expiration Date: **December 31, 2016**

Date of visit; **April 22, 2013** Time started; **9:00 a.m.** Time ended; **10:50 a.m.**

Facility representative(s); **Debora Butler-Peaks**

OEPA inspector; **Sandra D. Leibfritz**

SWP3;

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

A1. Did it include a site map? **YES**

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? **NA**

Comments;

**The facility was built in approximately 1988.  
There are 40 employees and 15 management positions.**

Inspection records:

B. Were inspection records available? **YES**

Comments:

Site Observations:

C. Are materials stored exposed to weather? **YES**

If Yes, list materials.

1. **On the north side of the building, there is a metal pipe that is approximately an inch in diameter. There was a milky white liquid beneath the pipe. On the interior wall, there is a compressor. The blowdown water from air compressors is known to contain lubricating oil and other pollutants. Lubricating oil can be whitish in color.**
2. **There were yellow trash receptacles on the west side of the building. One was full of trash and other debris. This receptacle was not under roof or under cover.**
3. **There is trash on the ground in the loading/unloading areas and around the trash compactor. These areas were not under roof or under cover.**
4. **The scrap metal container (Staker Alloy) and the three Waste Management containers are open. None of the containers were under roof or under covering.**

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 and rain gardens.

**No. This is a County owned industrial park. Superior Trim's storm water does flow to the County's open-ditch storm water channels that ultimately flow to the County's storm water pond.**

E. Number of outfalls from site/number inspected:

**There are two storm water outfalls. Also, there is sheet flow from the facility to the open ditches on the west and south sides of the building.**

**Outfall 001: There was standing water in the catch basin prior to discharge to the County's open ditch. The standing water was clear and did not have a sheen or odor.**

**Outfall 002: There was standing water in the county ditch. The water was hazy; however, there was a second pipe entering the ditch that was immediately adjacent to outfall 002. Immediately upstream of outfall 002, the water in the ditch was clear.**

F. Did any show evidence of pollutants discharged in the storm water? **YES**

If yes, describe;

**Soft trim was observed near the County's storm water pond and near the open ditch. Other trash, such as plastic food dishes and plastic bottles, was also observed on the north, west and east sides the parking/driving areas.**

G. Other observations/comments;

The facility's SIC code is 3714 (Motor Vehicle Parts and Accessories). Superior Trim's swp3 also listed SIC code 3089 (Plastic Products, Not Elsewhere Classified).

The facility manufactures automotive and heavy truck parts. Their products include soft trim interior parts (e.g., door panels, rear and sidewall panels, headliners) and cabinets.

On the west side of the building, equipment is stored outside. The equipment was covered with a tarpaulin. The facility expects to use this equipment in the future.

On the south side of the building, empty metal racks and wood pellets that are used for transporting material to the facility are stored outside.

**Items requiring a response.**

There are twelve items listed below that require a response. We ask for a written response to this office no later than May 31, 2013. Your response must include a description of the corrective measures taken or will be taken or proposed. Your response should include the dates, either actual or proposed for completion of the corrective measures. These items are as follows:

1. The wrong permit number was cited in Superior Trim's swp3 and Annual Report (December 2012). Superior Trim must revise these documents and any other documents to reflect the correct NPDES permit number (i.e., No. 1GR01163). A single line through the wrong permit number with an annotation of initials and date of correction is sufficient.
2. There are floor drains inside the facility. Ms. Butler-Peaks believes that the floor drains discharge to the sanitary. Employees seem to recall that all floor drains were televised to confirm their connection to the sanitary; however, Findlay Industries took all records with them when the company was sold to Superior Trim. Superior Trim must confirm that all floor drains are connected to the sanitary by dye testing, by televising the drains or by plumbing record.
3. Where is the water from the water jets disposed of? How are the insert presses cooled (e.g., chillers, cooling water and etc.)? There also appeared to be a water conditioning tanks inside. If so, where is the backwash discharged to (i.e., sanitary or storm sewer)?
4. There is significant soil erosion to the open ditch on the north side of the building. Superior Trim must take corrective actions and implement control measures to stabilize this area. Control measures for bank stabilization include riprap, erosion control matting or equivalent to prevent sediments from entering the open ditch.

5. The oily blowdown from the air compressor must be collected and properly disposed of. Superior Trim must take corrective actions and implement control measures to eliminate the discharge to pavement. Control measures to eliminate the discharge include connecting it to the sanitary sewer, installing a holding tank or equivalent.
6. There is a cleanout on the north side of the building. Is this the sanitary line that connects to the County's sewer?
7. At outfall 002, there were two pipes entering the County's storm water pond. One was metal and the other was a black corrugated pipe. Which pipe is outfall 002?
8. Superior Trim must take corrective actions and implement control measures for the trash receptacles on the west side of the building. Control measures for trash receptacles include covering the dumpster (e.g., under roof or under cover), moving the dumpster indoors or providing an equivalent means of eliminating storm water from contacting the trash.
9. On the west side of the building, there are empty totes of isocyanate with wire cages and blue plastic drums. The empty totes and drums may be stored outside as long as the containers are sealed and they are without operational taps or valves. Superior Trim must confirm and provide a written statement that this condition is met.
10. There is a significant amount of trash on the north, west and south sides of the building. In addition, there is trash in the loading/unloading areas and around the trash compactor. Superior Trim must take corrective actions and implement control measures by sweeping at regular intervals, storing trash in appropriate containers with lids, storing containers under roof or under cover and/or equivalent measures to minimize the presence of these materials.
11. The scrap metal container and the solid waste roll-offs on the south side of the building are open. Superior Trim must take corrective actions and implement control measures. Control measures include covering the containers/roll-offs (e.g., under roof or under cover), moving the containers/roll-offs indoors or providing an equivalent means of eliminating storm water from contacting the material.
12. Areas that are subject to storm water requirements (i.e., west and south sides of the building) must also meet the requirement for visual assessment even if there is not a pipe. These two areas have uncovered dumpsters and roll offs that are exposed to storm water. Storm water sheet flows off these two areas. There is a video on our web page that demonstrates "How to Collect a Sheet Flow Sample." This video may be obtained at the following link: [http://epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx)