



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

May 13, 2013

Mr. John Bowman
Facility Engineer
Globe Motors
1960 Troy Street
Dayton, OH 45404

RE: Montgomery County, Globe Motors, Compliance Evaluation Inspection

Dear Mr. Bowman:

On April 24, 2013, I conducted a Compliance Evaluation Inspection at the Globe Motors located at 1944 Troy Street Dayton, Ohio. The facility has obtained coverage under the general permit for "Non-contact Cooling Water" (NPDES Permit No. OHN000004; OEPA Permit No. 1GN00005*DG) and the "Multi-sector General Permit" for storm water (NPDES Permit No. OHR000005; OEPA Permit No. 1GR00172*EG). As part of the inspection process a compliance evaluation was performed on the data submitted in monthly Discharge Monitoring Reports. No Effluent limit violations were discovered for the period of time reviewed (January 1, 2012 to April 1, 2013 – see Attachment 1). A copy of the inspection reports has been included with this letter.

The inspection included a review of the General Lab Criteria. Previous inspections have not included a review of the General Lab Criteria and the facility will need to ensure that all of the minimum requirements are satisfied. A copy of the General Lab Criteria was emailed to you for your use.

During the inspection we discussed the potential for the facility to certify "No Exposure". The following link is to the Ohio EPA website which provides guidance regarding the "No Exposure" certification criteria: <http://www.epa.gov/npdes/pubs/noxguide.pdf>.

If you have any questions regarding this matter please feel free to contact me at (937) 285-6107 or via email at: Robert.Ostendorf@epa.state.oh.us.

Sincerely,

Bob Ostendorf Jr.
Environmental Specialist
Division of Surface Water

BO/kb

Enclosure(s)



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1GN0005*DG	OHN000004	04/24/13	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Globe Motors 1944 Troy Street Dayton, OH 45404	9:00	January 1, 2011
	Exit Time	Permit Expiration Date
	11:45	December 31, 2015
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Bowman, Facility Engineer	937-229-8588	
Name, Address and Title of Responsible Official	Phone Number	
John Bowman Globe Motors 1960 Troy Street Dayton, OH 45404	937-229-8588	

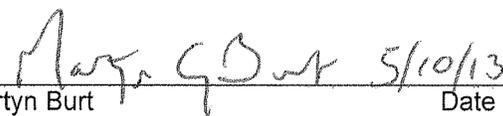
Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	M	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	N	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

See Attached Summary of Findings / Comments

Inspector	Reviewer
 Bob Ostendorf Jr. Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
5-10-13 Date	5/10/13 Date

Summary of Findings / Comments

The facility was represented by Mr. John Bowman. During the inspection it was confirmed that Table 2 is the applicable table in NPDES permit 1GN00005*DG. It was determined that the source water for the non-contact cooling water is city supplied water. It was confirmed that the discharge is from a single pass-through with no chemical additions. The non-contact cooling water is used for cooling various transformers and hydraulic units present at the facility. It was noted that the facility has installed carbon filtration for the water which is used for non-contact cooling water.

During the inspection the sampling and analysis performed by the facility was discussed. The discussion revealed that the thermometer used for monitoring the temperature of the final effluent was not NIST certified. The company recently installed continuous monitoring for pH. The company has also installed a flow meter for use in monitoring the volume of water used for non-contact cooling. During the inspection the calibration of the various monitoring devices were discussed. The documentation requirements for the monitoring being performed on the final effluent were also discussed. Previous inspections of the facility did not include a review of the General Lab Criteria. Subsequent to the inspection a copy of the General Lab Criteria was emailed to the company for their use.

**ATTACHMENT 1
EFFLUENT LIMIT VIOLATIONS
(Period of Review: January 1, 2012 – April 1, 2013)**

<u>Reporting Period</u>	<u>Parameter</u>	<u>Limit Type</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Violation Date</u>
No violations discovered for the period of time reviewed.					

Industrial Storm Water
Compliance Evaluation Inspection

Name of facility; Globe Motors
Address; 1944 Troy Street
Dayton, OH 45404

Permit number; 1GR00172*EG

Applicable permit sector; F – Primary Metals

Date of visit; 4/24/12 Time started; 9:00 a.m. Time ended; 11:45 a.m.

Facility representative(s); Mr. John Bowman, Facility Engineer

OEPA inspector; Bob Ostendorf Jr.

SWP3:

- A. Did the facility representative produce an SWP3? **Y / N / Not requested**
- A1. Did it include a site map? **Y / N**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y / N**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y / N**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **Y / N**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **Y / N / NA**

Comments;

The applicable subsector for the facility is F4 – Nonferrous Foundries. The SWP3 for the facility needs to be reviewed and updated as needed. The facility is performing the benchmark monitoring but the SWP3 does not reflect this requirement.

Inspection records:

- B. Were inspection records available? **Y/N**

Comments:

The facility has performed routine inspections of outside storage areas.

Site Observations:

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

Industrial Storm Water
Compliance Evaluation Inspection

Scrap Metal – small amount stored outside and exposed to the elements.

- 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 . **Y / N / Not sure**

- E. Number of outfalls from site/number inspected: 6 / 6 (catch basins)

- G. Did any show evidence of pollutants discharged in the storm water? **Y / N**

If yes, describe; See "D" above.

- H. Other observations/comments;

The following observations were made during the inspection and will need to be addressed by the facility:

1. The facility routinely cleans the roof from any particulate accumulation that may occur.
2. The facility may want to consider pursuing a "No Exposure" certification.