



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

June 3, 2013

RE: MAHONING COUNTY
CANFIELD TOWNSHIP
DUNAWAY, INC.
NPDES PERMIT NO. OHR000005
OHIO EPA PERMIT NO. 3GR01231*EG
INDUSTRIAL STORM WATER INSPECTION

Michael Dunaway, President
Dunaway, Inc.
P.O. Box 488
Canfield, OH 44406

Dear Mr. Dunaway:

On May 23, 2013, Ohio EPA conducted an inspection at Dunaway, Inc., located at 5959 Leffingwell Road, Canfield Township, Mahoning County (facility). During the inspection, the facility was represented by Jonie Foster, Vice President.

The facility's industrial activities appear to be categorized by Standard Industrial Classification (SIC) Code 3544: Special Dies and Tools, Die Sets, Jigs and Fixtures, and Industrial Molds and is authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01231*EG.

Site Inspection

The inspection documented the following:

- A copy of the facility's storm water pollution prevention plan (SWP3) was not available at the facility. Ms. Foster was unaware of the facility's SWP3. A copy of the facility's SWP3 must be retained at the facility and be immediately available to Ohio EPA. Please submit a copy of the facility's SWP3 to Ohio EPA for review. In the event that a SWP3 has not been developed for the facility, the following websites offer information that may assist you in developing and implementing a SWP3:

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U.S. EPA's Sample SWP3 Template:
http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp

U.S. EPA's Industrial Fact Sheet Series:
<http://cfpub.epa.gov/npdes/stormwater/swsectors.cfm>

Ohio EPA's Industrial Storm Water Program:
http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

- A hopper utilized to store cuttings was located outdoors in an area exposed to precipitation events. The hopper was not water tight, as documented by the holes present along the joints and the oil staining observed on the ground. Ohio EPA recommends that the hopper be relocated under a permanent roofed structure or retrofit with a temporary cover (i.e. tarp, etc.). The hopper must also be repaired or replaced in order to be leak-proof. In addition, the oil-stained soil must be remediated and properly disposed.
- Secondary containment and spill kits should be provided within the fifty-five gallon drum storage area.

Corrective Actions

The following corrective actions must be performed:

1. A SWP3 must be developed and implemented at the site. A copy of the facility's SWP3 must be submitted to Ohio EPA for review by July 3, 2013.
2. Appropriate best management practices (BMP) must be implemented to address the above deficiencies. A written report must be submitted to Ohio EPA within fourteen (14) days of receiving this notification that details how the deficiencies have been or will be addressed. The written report must also include dates detailing when each corrective action (i.e. BMP) was or will be implemented.

Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail chris.moody@epa.ohio.gov.

Sincerely,


Chris Moody
Environmental Specialist II
Division of Surface Water

CM:bo

ec: Michael Dunaway, Dunaway, Inc.