



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

May 31, 2013

Mr. Scott Richardson
Georgia Steel Fabricating Inc.
1207 US Rt. 42 S.
Lebanon, OH 45036

**RE: Notice of Violation
Georgia Steel Fabricating Inc.– CEI Report
Industrial Storm Water Permit – Ohio EPA Facility Number 1GR01082*EG**

Dear Mr. Richardson:

On May 16, 2013, I conducted a compliance evaluation inspection (CEI) of the Georgia Steel Fabricating 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 3441 and is required to comply with the site-specific requirements of subsector AA of the storm water permit, in addition to the general requirements. You and I conducted the inspection, which included a facility walk-through.

Non-Compliance with the NPDES Permit

Georgia Steel Fabricating Inc. applied for coverage under the general storm water NPDES permit on January 24, 2012, but it appears that the company has not been complying with several of the requirements of the permit; such as completing a storm water pollution prevention plan (SWP3). Some of the salient features of the storm water permit (which should be part of the SWP3) include, but are not limited to:

- Quarterly routine inspections with associated inspection reports
- Quarterly visual inspections with associated inspection reports
- Comprehensive annual site inspections with associated reports
- Sampling at storm water outfalls

By no later than July 31, 2013, Georgia Steel Fabricating Inc. must complete a SWP3 for the facility and implement the best management practices, inspections and all other requirements of the storm water permit. A copy of the SWP3 must be submitted to this office by the same date.

I have included the following hyperlinks to assist you in updating your SWP3 and site-specific storm water program:

Industrial general storm water permit web page –
http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

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Industrial SWP3 guidance –
http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf

Industrial storm water monitoring and sampling guide –
http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf

How to collect a grab sample –
<http://www.youtube.com/watch?v=oWKdonc9iDw&feature=youtu.be>

Electronic discharge monitoring report submission system (eDMR) –
<http://epa.ohio.gov/dsw/edmr/eDMR.aspx>

Observations Noted During the Site Inspection

- 1.) It is unclear how the several catch basins located onsite route the storm water.
- 2.) At the furthest southern point of the facility it appears that storm water may be leaving the site and flowing into a ditch and not routed through any of the catch basins to the retention pond area.
- 3.) The retention pond does not appear to receive the flow from onsite. The basin was filled in with a thick stand of grass. The outfall pipe from the basin is elevated from the bottom of the pond yet no standing water was present nor was there evidence of standing water in the recent past.
- 4.) The area where the material is stored is a gravel surface.

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) 285-6028 or by electronic mail at michelle.waller@epa.state.oh.us.

Respectfully,



Michelle Waller
Environmental Specialist II
Division of Surface Water

MW/kb

Industrial Storm Water Compliance and Enforcement Inspection:

Name of facility: Georgia Steel Fabricating Inc.

Address; 1207 S. US Route 42, Lebanon, Ohio 45036

Permit number: 1GR01082*EG Applicable permit sector; AA

Date of visit: 5/16/2013 Time started: 9:35am Time ended: 10:47am

Facility representative(s): Scott Richardson

OEPA inspector: Michelle Waller

SWP3:

Did the facility representative produce an SWP3? **No**

A. A1. Did it include a site map? **No**

B. A2. Did it include schedules and procedures for the quarterly routine facility inspections? **No**

A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **No**

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? **No**

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?
No

Comments: Benchmark monitoring is required but no sampling has been performed.

Inspection records:

C. Were inspection records available? **No**

Comments: No records of any inspections being performed.

Site Observations:

D. Are materials stored exposed to weather? **Yes.**
If Yes, list materials.
Steel.

E. 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 . Materials are stored on a gravel pad.

F. Number of outfalls from site/number inspected: **1/1**

G. Did any show evidence of pollutants discharged in the storm water? **No**