



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

June 19, 2013

RE: CUYAHOGA COUNTY
VILLAGE OF WALTON HILLS
INDUSTRIAL STORM WATER
FORD MOTOR COMPANY
3GR00663*EG

Cindy Turk
Environmental & Industrial Materials
Ford Motor Company
7845 Northfield Road
Walton Hills, OH 44146

NOTICE OF VIOLATION

Dear Ms. Turk:

On May 29, 2013, Ohio EPA conducted an inspection at the Ford Motor Company facility located at 7845 Northfield Rd. Our inspection's purpose was to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity #OHR000005. The site's industrial activities are categorized by the Standard Industrial Classification (SIC) Code 3465: Fabricated Metal Products, except Machinery & Transportation Equipment, & Coating, Engraving, & Allied Services. This corresponds to Subsector AA1 in Part 8 of the NPDES permit. During the inspection, Charley Daigen and you represented Ford Motor Company. Dan Bogoevski and I represented Ohio EPA.

Storm Water Outfalls

Our records show that general permit coverage for your facility was renewed on May 1, 2012. The Notice of Intent (NOI) submitted by Ford Motor Company to renew coverage indicates that there is only one storm water outfall from the facility (001) while the Site Map indicates that there are three outfalls (001, 002 and 003). Our site inspection revealed that there are actually four outfalls from the property. In addition, the Outfall labeled 002 on the Site Map is not actually an outfall, but a point where storm water enters your storm sewer system from off-site. The discharge end of this storm sewer system is what really should be labeled Outfall 002.

The four outfalls Ohio EPA identified were:

- 001 – Discharge from areas that front Northfield Road
- 002 – Discharge from the storm sewer system that enters the site near the NE corner and discharges into the same structure as 001
- 003 – Discharge from the SE corner of the property
- 004 (newly-identified outfall) – Discharge from storm sewer system located north of 003.

Both 003 and 004 discharge off-site to the drainage channel along the railroad tracks to the east of the facility. Drainage from this channel is subsequently directed into the storm sewer system that discharges at Outfall 002.

All outfalls must be identified on the NOI. To correct this error, please either submit a revised NOI or letter to our Central Office acknowledging the additional three outfalls. For each outfall, identify the SIC and subsector codes associated with the outfall as well as the latitude and longitude. There are no federal effluent limitations for storm water discharges from this facility. The revised NOI or letter should be sent **within 14 days** of this letter to:

Jason Fyffe
Ohio EPA Division of Surface Water
P.O. Box 1049
Columbus, OH 43216-1049

The NOI can be found on our website at:

http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

It appears that the four total outfalls can be reduced to three representative outfalls for purposes of quarterly visual assessment and benchmark monitoring. The SWPPP must identify which outfalls are substantially identical. One outfall within each group of substantially identical outfalls should be selected for benchmark monitoring throughout the term of the general permit. Quarterly visual assessment must be rotated amongst all the outfalls within each group of substantially identical outfalls over the term of the general permit.

Monitoring, Recordkeeping and Reporting

Ohio EPA reviewed recordkeeping associated with required site inspections and storm water monitoring. Our inspection revealed that Ford Motor Company is in compliance with all recordkeeping and reporting requirements of the NPDES permit. However, we noted the following items that require your attention to ensure violations do not occur in the future:

- The Storm Water Pollution Prevention Plan (SWPPP) indicates that Routine Facility Inspections are to occur once per month. The Routine Facility Inspection for May 2013 had not yet been conducted as of the date of inspection. You were advised that a routine inspection would need to be conducted by May 31, 2013, to prevent a violation. Also, we noted that inspection of the oil-water separators near the Baler House was not included on the checklist used to conduct routine facility inspections. All storm water control measures are to be inspected when conducting routine and comprehensive inspections.
- A Quarterly Visual Assessment of storm water discharges has not yet been conducted for second quarter 2013. Please conduct an assessment no later than June 30, 2013, to remain in compliance with the NPDES permit.
- Ford Motor Company has not yet conducted any benchmark monitoring for this facility as required by Section 6.2.1 and Section 8.AA.5 of the NPDES permit. Benchmark monitoring must be conducted for at least 4 storm events over the first three years of the NPDES permit term. Thus, benchmark monitoring must be completed by December 31, 2014. You indicated that this plant is scheduled to be shut down in June 2014; however, the situation is not known with complete certainty. As such, Ohio EPA recommends that benchmark monitoring be conducted as required to ensure that you are not found in violation should operations at the facility continue beyond December 31, 2014. For parameters that are hardness-dependent, please be sure to use the hardness of the receiving stream, i.e., Tinkers Creek. Data on the Ohio EPA website indicates that the mean hardness for Tinkers Creek is 263 mg/L.

- Although training materials have been prepared, employee training on storm water pollution prevention has not yet been conducted for 2013. Please be sure to conduct annual training before December 31, 2013.

Storm Water Pollution Prevention Plan (SWPPP)

Part 5 of the NPDES permit requires facilities to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). For facilities continuing coverage from prior generations of the general permit, the SWPPP was to be updated by July 1, 2012. The SWPPP for Ford Motor Company was updated by this date; however, we noted that some information is already out of date. As an example, the process to evaluate and manage discharges from the 20,000 gallon Pit Load/Unload Area (W-37) was changed in the Fall of 2012, yet Section 3.9 of the SWPPP was not updated to reflect the change in process. Please ensure that the SWPPP is updated as required by Part 5.2 of the NPDES permit and within timeframes required in Part 3.3 of the NPDES permit. In addition, Ohio EPA noted the following violations of Part 5.1.2 of the NPDES permit after reviewing the Site Map:

- Failure to show the location of all storm water control measures. The map did not show the oil-water separators near the Baler House.
- Failure to show the location of all storm water outfalls. As previously mentioned, the site map did not show Outfall 002 and the newly-identified Outfall 004.

Part 5.1.3.4 of the NPDES permit requires the SWPPP to include an evaluation that all non-storm water discharges have been eliminated. A certification was located in an old SWPPP, but not with the current SWPPP. You must keep a copy in the current SWPPP and the facility should be re-evaluated for non-storm water discharges whenever there is a change in facility drainage to ensure the modifications do not create an unauthorized non-storm water discharge. Interior floor drains should have been evaluated as part of the process. You indicated that the SPCC plan includes an indoor floor drain path statement that you can reference in the SWPPP. Please provide us with a copy of this statement.

Site Inspection

Our inspection of the site revealed the following concerns regarding storm water pollution:

1. Good Housekeeping practices such as sweeping sediment and grit, and picking up trash are needed throughout the site to help eliminate potential storm water pollution. It was most necessary in the following locations:
 - a. The Backup Truck Access near the southwest corner of the lot.
 - b. JIT Dock
 - c. Adjacent sewer to the east of SW004.
 - d. All along the fence along the railroad tracks on the east side of the property
 - e. Around the Baler House to clean up overflowing metal scrap (see Fig 4)
2. There were some visible spills that need to be cleaned up immediately. These were found in the locations of:
 - a. The leaking dumpster in the Dumpster Area on the east side.
 - b. Oil spill on the ground by the A-6 door (see Fig 2).
3. Make sure all spill kits are labeled which includes the one by the shipping and receiving dumpsters and next to the diesel tank.

4. It is a requirement to vegetate or stabilize all land 14 days after final grade. This action needs to be implemented on the embankment and drainage channels along the south side of the property. Stabilization is required to prevent sediment-laden discharge to the storm sewer system.
5. All dumpsters must be covered. This includes the dumpster in the Shipping and Receiving Lot between Docks 1 and 2, the JIL Door dumpsters, and others containing waste or scrap materials (see Fig 3). Dumpsters may also be stored indoors in lieu of providing cover with a tarp or lid.
6. Some type of preventative action needs to be taken to prevent the rust from the racks from draining into the storm sewers. Painting the racks or moving them into the empty building on the southeast corner intended for rack storage, are two possible solutions.
7. We identified a previously unidentified white pipe entering the manhole labeled 002 on the current site map (see Fig 1). Please determine what discharges from this pipe and whether it is storm water, an allowable non-storm water discharge or an unauthorized non-storm water discharge. If this pipe conveys an unauthorized non-storm water discharge, you must take action to eliminate it.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than **July 2, 2013**.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1125 or by e-mail julianna.murphy@epa.state.oh.us.

Sincerely,



Julianna Murphy
Assistant to the District Engineer
Division of Surface Water

JM:ddw

cc: Charley Daigen, Environmental Engineer, Ford Motor Company
Don Sheehy, Engineer, Village of Walton Hills

ec: Dan Bogoevski, DSW, NEDO
Jason Fyffe, DSW, CO



Figure 1: Unidentified white pipe entering the manhole labeled 002.



Figure 2: Clean up all spills immediately, and record if significant.



Figure 3: All dumpsters outside need to be covered.

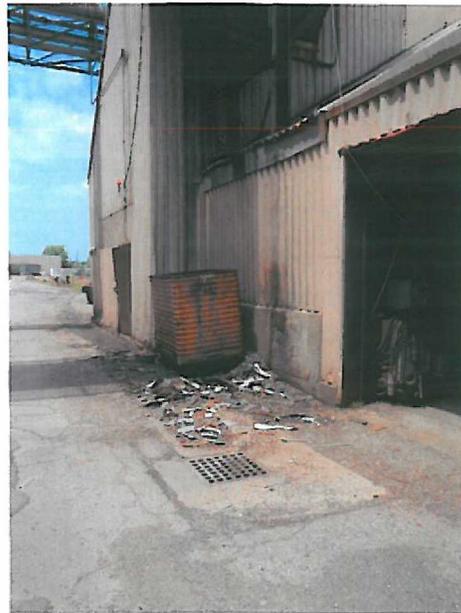


Figure 4: Good Housekeeping skills need to be implemented throughout the site.