



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

June 25, 2013

RE: COLUMBIANA COUNTY
BUTLER TOWNSHIP
APPALACHIAN TRAILERS, INC.
NPDES PERMIT NO. OHR000005
OHIO EPA PERMIT NO. 3GR01226*EG
INDUSTRIAL STORM WATER INSPECTION

Thorne Saunders, General Manager
Appalachian Trailers, Inc.
5409 State Route 9
Salem, OH 44460

Dear Mr. Saunders:

On May 29, 2013, Ohio EPA conducted an inspection at Appalachian Trailers, Inc., (facility) located at 5409 State Route 9, Butler Township, Columbiana County. During the inspection, you represented the facility.

The facility's industrial activities appear to be categorized by Standard Industrial Classification (SIC) Code 3799: Transportation Equipment, Not Elsewhere Classified and is authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (Multi-Sector General Permit), permit No. 3GR01226*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. You attempted to contact the main office located in North Carolina regarding the SWP3, but were unable to establish contact. 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, U.S. EPA has developed a "Sample SWP3 Template", which is available under the "Policy and Guidance Documents" section of the following website:

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

- Routine facility inspections are not being performed. Please be aware that, at a minimum, the documentation of each routine facility inspection must include:
 - The inspection date and time;
 - The name(s) and signature(s) of the inspector(s);
 - Weather information and a description of any discharges occurring at the time of the inspection;
 - Any previously unidentified discharges of pollutants from the site;

- Any control measures needing maintenance or repairs;
 - Any failed control measures that need replacement;
 - Any incidents of noncompliance observed; and
 - Any additional control measures needed to comply with the permit requirements.
- Quarterly visual assessments of the facility's outfalls have not yet commenced. Part 4.2.1 of the Multi-Sector General Permit requires quarterly visual assessments to occur on a quarterly frequency. In addition, the appropriate documentation of each quarterly visual assessment must include:
 - Sample location(s)
 - Sample collection date and time, and visual assessment date and time for each sample;
 - Personnel collecting the sample and performing visual assessment, and their signatures;
 - Nature of the discharge (i.e., runoff or snowmelt);
 - Results of observations of the storm water discharge;
 - Probable sources of any observed storm water contamination; and
 - If applicable, why it was not possible to take samples within the first 30 minutes and/or from a 72 hour (3 day) storm interval.
 - Annual storm water training of employees is not being conducted. Please be aware that storm water training must be conducted, at a minimum, on an annual frequency and must cover the specific control measures, monitoring, inspection, planning, reporting, and documentation requirements established within the Multi-Sector General Permit.
 - Onsite mobile fifty-five gallon drums of coolant are utilized throughout the facility that are leaking (Figure 1 to 2). Appropriate best management practices (BMP) (i.e. secondary containment, berming, cover, etc.) must be implemented to prevent the discharge of pollutants during precipitation events. In addition, a spill kit must be located within the area where the mobile fifty-five gallon drums are utilized.
 - A diesel tank with secondary containment is present at the facility (Figure 3). A spill kit must be located within this refueling area in order to address potential spills or leaks.
 - A hopper containing coolant coated metal fines was leaking coolant in an area exposed to precipitation events (Figure 4). Appropriate BMPs (i.e. cover and pavement cleaning, etc.) must be implemented to address the hopper leaking coolant.
 - Empty fifty-five gallon drums are turned upside down to drain residual liquids onto the ground (Figure 5). In addition, some of the empty fifty-five gallon drums were stored upright and were not properly capped (Figure 6). Appropriate BMPs (i.e. prohibiting draining residual liquids and capping the empty drums containing residual liquids prior to proper disposal, etc.) must be implemented to address the fifty-five gallon drum storage area.

- The solid waste dumpster was leaking fluids (Figure 7). Please be aware that precipitation that contacts solid waste is considered a leachate that is not authorized for discharge under the Multi-Sector General Permit. Appropriate BMPs (i.e. cover the dumpster, ensuring no holes in the dumpster, lining the dumpster, etc.) must be implemented to prevent the discharge of leachate.
- Used paint filters are stored within an empty fifty-five gallon drum that is uncovered and exposed to precipitation events (Figure 8). Appropriate BMPs (i.e. cover, etc.) must be implemented to prevent the discharge of pollutants associated with the paint filters during precipitation events.

Corrective Actions

The following corrective actions must be performed:

1. The facility's SWP3 must be revised to be reflective of the requirements established within the Multi-Sector General Permit. A copy of the facility's SWP3 must be submitted to Ohio EPA for review by July 25, 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 email chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM:ddw



Figure 1 - Onsite mobile fifty-five gallon drums of coolant are leaking throughout the facility.



Figure 2 - Onsite mobile fifty-five gallon drums of coolant are leaking throughout the facility.

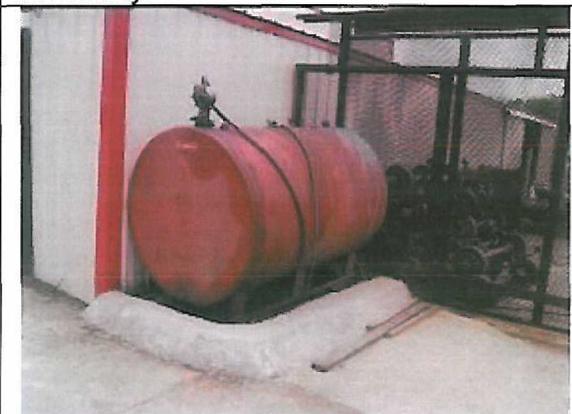


Figure 3 - A spill kit must be located within this refueling area in order to address potential spills or leaks.



Figure 4 - A hopper containing coolant coated metal fines was leaking coolant.



Figure 5 - Empty fifty-five gallon drums are turned upside down to drain residual liquids onto the ground.



Figure 6 - Some of the empty fifty-five gallon drums were stored upright and were not properly capped.



Figure 7 - The solid waste dumpster was leaking fluids.

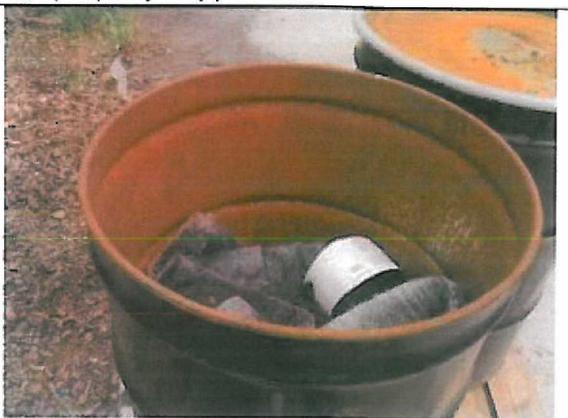


Figure 8 - Used paint filters are stored within an uncovered, empty fifty-five gallon drum.