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

July 24, 2013

RE: TRUMBULLCOUNTY
CITY OF GIRARD
TRINITY HIGHWAY PRODUCTS LLC
NPDES PERMIT NO. OHR000005
OHIO EPA PERMIT NO. 3GR01279*EG
INDUSTRIAL STORM WATER INSPECTION

Michael Biegenwald, Safety Environmental Manager
Trinity Highway Products LLC
1170 North State Street
Girard, OH 44420

Dear Mr. Biegenwald:

On June 18, 2013, Ohio EPA conducted an inspection at Trinity Highway Products LLC, located at 1170 North State Street, City of Girard, Trumbull County (facility). I was accompanied by Tomas Parry of Ohio EPA. During the inspection, the facility was represented by you and Jerry Bennett, Plant Manager.

The facility's industrial activities appear to be categorized by Standard Industrial Classification (SIC) Code 3441: Fabricated Structural Metal and is authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (Multi-Sector General Permit), permit No. 3GR01279*EG.

Site Inspection
The inspection documented the following:

- A copy of the facility's storm water pollution prevention plan (SWP3) was available during the inspection and provided to Ohio EPA. The SWP3 was revised August 2, 2012.

- The facility has a total of ten storm water outfalls; however, due to discharges from substantially identical effluents, only outfall nos. 3, 4, and 12 are being monitored.

- A contractor is utilized for the proper disposal of mill sludge, solids, and soluble cutting oils.

- Routine facility inspections are occurring on a monthly frequency and recorded within an Excel spreadsheet; however, the last recorded routine facility inspection was dated March 18, 2013.

- Inspection of forklifts, pick-up trucks, and oil/water separators occur a monthly frequency. Maintenance is performed by a contractor that is based on the number of machine hours for each specific piece of equipment.

- Benchmark monitoring and quarterly visual outfall monitoring is occurring. The last monitoring event was performed on April 10, 2013 and detailed suspended solids.

- Employee training occurred on January 22, 2013 and no copies of materials utilized are being maintained. You indicated that the training typically consists of utilizing the SWP3 in a lecture format.

- The facility's annual comprehensive site inspection was last performed December 19, 2012.

- Uncovered solid waste dumpsters were in a location exposed to precipitation events (Figure 1). Solid waste materials were observed on the ground around the dumpsters (Figure 2). Please be aware that precipitation that contacts solid waste is considered a leachate that must be properly managed (i.e. collected for offsite treatment and disposal). Improved good housekeeping (i.e. trash pick-up, etc.) measures and covering the solid waste dumpsters must be implemented.

- A roll-off container is leaking soluble oils and lubricants (Figure 3). In addition, an orange colored fine material was also observed (Figure 4). Appropriate best management practices (BMP) (i.e. tarping, lining, sweeping fines, etc.) must be implemented to prevent the discharge of pollutants. In addition, the ponded soluble oils and lubricants must be collected for proper disposal.

- A tow lift awaiting maintenance is being stored outdoors in an area exposed to precipitation events and was observed leaking fluids (Figure 5). Appropriate BMPs (i.e. relocating leaking equipment under roof, using drip pans, etc.) must be implemented to prevent the discharge of pollutants.

- The containment around the waste oil storage area is nearly full and requires cleaning (Figure 6). In addition, waste oil was spilled on the ground during transferring to the collection tank (Figure 7). Good housekeeping measures must be implemented to remediate the spillage.

- Used batteries were stored outdoors exposed to precipitation events (Figure 8). The batteries must be relocated under a roof to minimize exposure to precipitation events.

- A drill that is expected to be shipped from the facility is leaking oil (Figure 9). Appropriate BMPs (i.e. tarping and drip pans, proper draining, etc.) must be implemented to prevent the discharge of pollutants.

- Uncapped totes were stored in an area exposed to precipitation events (Figure 10). Empty totes must be properly capped to minimize the potential exposure from precipitation to with residual materials.

- Tow lift radiators are washed in a location that drains outdoors (Figure 11). Please be aware that this is a wastewater that is not authorized for discharge under the Multi-Sector General Permit. This wastewater must be properly managed via one of the following options:

    - Obtaining an NPDES permit to authorize the discharge;
    - Directing the wastewater into a sanitary sewer for proper treatment; or
    - Obtaining a permit-to-install for the installation of holding tank designed to collect and hold the wastewater. The wastewater is then properly treated and disposed offsite.

- Iron sulfate is stored in uncovered roll-off containers (Figure 12). Upon inspection, the roll-off containers are partially lined (Figure 13); however, since the roll-off containers are stored in an area exposed to precipitation events, the roll-off containers should be covered to prevent a discharge of potential pollutants.

- Concrete washout was occurring in a location that could result in a discharge of pollutants (Figure 14). Concrete washout must occur in a location that is contained to eliminate the potential to discharge pollutants.

- The facility should evaluate the rust generation that is occurring throughout the facility as a result of the sulfuric acid that is utilized in production. The rust generation may increase the concentration of suspended solids being discharged through the facility's outfalls during precipitation events.

Benchmark Monitoring Results

A review of the benchmark monitoring results submitted to Ohio EPA for the period of January 1, 2011 to July 1, 2013. revealed the following benchmark exceedences.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01105	Aluminum, Total (Al)	1D Conc	750	4230.	9/26/2012
002	01105	Aluminum, Total (Al)	1D Conc	750	9020.	9/26/2012
003	01105	Aluminum, Total (Al)	1D Conc	750	2540.	9/26/2012
003	01105	Aluminum, Total (Al)	1D Conc	750	4160.	12/28/2012
001	01105	Aluminum, Total (Al)	1D Conc	750	53500.	4/10/2013
002	01105	Aluminum, Total (Al)	1D Conc	750	22300.	4/10/2013
003	01105	Aluminum, Total (Al)	1D Conc	750	18800.	4/10/2013
001	00630	Nitrite Plus Nitrate,	1D Conc	0.68	.92	9/26/2012
002	00630	Nitrite Plus Nitrate,	1D Conc	0.68	.704	9/26/2012
003	00630	Nitrite Plus Nitrate,	1D Conc	0.68	.76	9/26/2012
001	00630	Nitrite Plus Nitrate,	1D Conc	0.68	2.04	12/28/2012
002	00630	Nitrite Plus Nitrate,	1D Conc	0.68	1.26	12/28/2012

003	00630	Nitrite Plus Nitrate,	1D Conc	0.68	8.44	12/28/2012
001	00630	Nitrite Plus Nitrate,	1D Conc	0.68	2.45	4/10/2013
002	00630	Nitrite Plus Nitrate,	1D Conc	0.68	2.99	4/10/2013
003	00630	Nitrite Plus Nitrate,	1D Conc	0.68	1.19	4/10/2013
001	01092	Zinc, Total (Zn)	1D Conc	390	2630.	9/26/2012
002	01092	Zinc, Total (Zn)	1D Conc	390	5060.	9/26/2012
002	01092	Zinc, Total (Zn)	1D Conc	390	7620.	12/28/2012
003	01092	Zinc, Total (Zn)	1D Conc	390	1060.	12/28/2012
001	01092	Zinc, Total (Zn)	1D Conc	390	62100.	4/10/2013
002	01092	Zinc, Total (Zn)	1D Conc	390	12100.	4/10/2013
003	01092	Zinc, Total (Zn)	1D Conc	390	34700.	4/10/2013

Please be aware that in year four of the Multi-Sector General Permit, these results must be compared to the benchmark concentrations the facility must perform the following:

- Review the selection, design, installation, and implementation of your control measures to determine if modifications are necessary to meet the Part 2 control measures/best management practices (BMPs) of this permit; or

- Make a determination that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice to meet the control measures/best management practices (BMPs) in Part 2 of this permit. You shall also document your rationale for concluding that no further pollutant reductions are achievable, and retain all records related to this documentation with your SWPPP. You shall also notify Ohio EPA of this determination in your next benchmark monitoring report.

Storm Water Pollution Prevention Plan

Via a June 18, 2013, email, you provided a copy of the facility's SWP3 for review. Ohio EPA provides the following comments after reviewing the SWP3:

- Part 5.1.2 of the Multi-Sector General Permit requires a description of the nature of the industrial activities at the facility. The SWP3 does not appear to include this information.

- Part 5.1.2 of the Multi-Sector General Permit requires a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map) with enough detail to identify the location of the facility and all receiving waters for the storm water discharges. The SWP3 does not appear to include this information.

- Part 5.1.2 of the Multi-Sector General Permit requires a site map showing the locations of all existing structural control measures. The SWP3 does not appear to include all of the existing structure control measures provided within the "Inventory of Exposed Materials" section of the SWP3.

- Part 5.1.2 of the Multi-Sector General Permit requires a site map showing the locations of all potential pollutant sources. The SWP3 does not appear to include this information.

- Part 5.1.2 of the Multi-Sector General Permit requires a site map showing the locations where fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas, locations used for the treatment, storage, or disposal of wastes; liquid storage tanks; processing and storage areas; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; transfer areas for substances in bulk; machinery; and locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants. The SWP3 does not appear to include this information.

- Part 5.1.3.2 of the Multi-Sector General Permit requires a list of pollutants or pollutant constituents associated with each identified potential pollutant source. The SWP3 does not appear to include this information.

- The SWP3's "Rick Identification and Summary of Potential Pollutant Sources" section is incomplete and must include many of the items detailed within the "Site Inspection" section of this correspondence.

- Part 5.1.5.1 of the Multi-Sector General Permit requires a schedule for regular pickup and disposal of waste materials, along with routine inspections for leaks and conditions of drums, tanks, and containers. The SWP3 does not appear to include this information.

- Part 5.1.5.1 of the Multi-Sector General Permit requires spill prevention and response procedures to be documented in the SWP3. Although a "Spill Clean-up Procedures" section is provided within the SWP3, the specific spill prevention and response procedures are not documented within the SWP3.

- Part 5.1.5.2 of the Multi-Sector General Permit requires the SWP3 to include benchmark monitoring parameters for sampling, the frequency of benchmark monitoring sampling, and procedures for gathering storm event data. The SWP3 does not appear to include this information.

- Part 5.1.5.2 of the Multi-Sector General Permit requires the SWP3 to include a description of the general industrial activities conducted in the drainage area of each substantially identical outfall (SIO); a description of the control measures implemented in the drainage area of each SIO; a description of the exposed materials located in the drainage area of each SIO that are likely to be significant contributors of pollutants to storm water discharges; an estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%); and why the outfalls are expected to discharge substantially identical effluents. The SWP3 does not appear to include this information.

- Part 5.1.5.2 of the Multi-Sector General Permit requires the SWP3 to document procedures for performing routine facility inspections, quarterly visual assessments, and comprehensive site inspections. In addition, the person(s) or positions of person(s) responsible for inspection, schedules for conducting inspections, and specific items to be

covered by the inspection, including schedules for specific outfalls must also be detailed. The SWP3 does not appear to some of this information.

- The "Good Housekeeping" section of the SWP3 details that outside areas and, inside areas are to be inspected on a quarterly basis; however, during the inspection, you stated that a monthly inspection frequency occurs. The SWP3 must be revised to incorporate the inspection frequencies that are occurring at the facility.

- The "Measures and Controls (Best Management Practice's – BMP's)" section of the SWP3 must be revised to include many of the items detailed within the "Site Inspection" section of this correspondence.

Corrective Actions

The following corrective actions must be performed:

1. The facility's SWP3 must be revised by August 24, 2013, to be reflective of the requirements established within the Multi-Sector General Permit.

2. Appropriate best management practices (BMP) must be implemented to address the above deficiencies documented during the inspection. 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: Tomas Parry, Ohio EPA, NEDO, DSW

Figure 1 - Uncovered solid waste dumpsters were in a location exposed to precipitation events.

Figure 2 - Solid waste materials were observed on the ground around the dumpsters.

Figure 3 - A roll-off container is leaking soluble oils and lubricants.

Figure 4 - Orange colored fine materials associated with the roll-off container.

Figure 5 - A tow lift was observed leaking fluids outdoors.

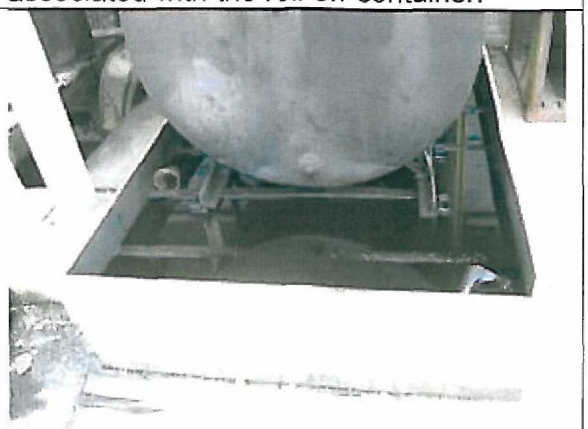

Figure 6 - The containment around the waste oil storage area requires cleaning.

Figure 7 - Waste oil was spilled on the ground that must be addressed.

Figure 8 - Used batteries were stored outdoors exposed to precipitation events

Figure 9 - A drill that is expected to be shipped from the facility is leaking oil.

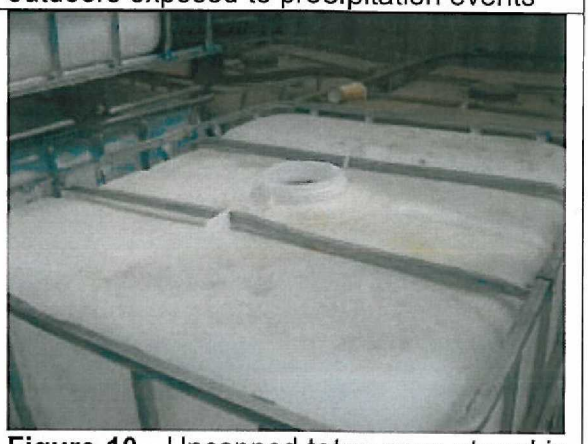

Figure 10 - Uncapped totes were stored in an area exposed to precipitation events.

Figure 11 - Tow lift radiators are washed in a location that drains outdoors.

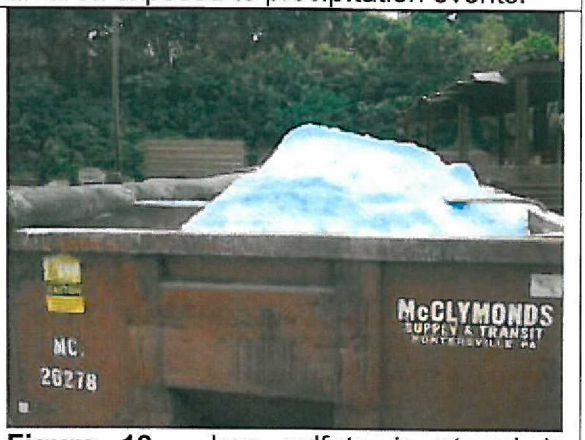

Figure 12 - Iron sulfate is stored in uncovered roll-off containers

Figure 13 - The iron sulfate roll-off containers are only partially lined.

Figure 14 - Concrete washout was occurring in a location that could result in a discharge of pollutants.