



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

July 26, 2013

RE: TIMKEN COMPANY – CANTON FACILITY  
NPDES COMPLIANCE EVALUATION INSPECTION  
3GR00394\*EG (MSGP)  
STORM WATER  
STARK COUNTY

Mr. Dan Lake  
Manager-Environmental Permitting  
The Timken Company  
Mail Code - GNE-24  
1835 Dueber Ave, SW  
PO Box 6927  
Canton, OH 44706-0927

Dear Mr. Lake:

On July 16 and 18, 2013, this writer conducted a compliance evaluation inspection of your facility for the purpose of determining compliance with the above referenced NPDES permit as well as the Timken Company individual NPDES Permit 3ID00021\*LD. Mr. Dominic Nardis represented The Timken Company on the 16<sup>th</sup> concerning the individual permit, and also accompanied me for the inspection of storm water outfalls. You represented The Timken Company on the 18<sup>th</sup> during the review of the Storm Water Pollution Prevention Plan (SWPPP). NPDES Permit 3GR00394\*EG is the Multi-Sector General Permit authorizing the discharge of storm water to waters of the state. Below you will find a summary of my observations:

### **General**

The Timken Company is located south of the City of Canton, Stark County. Manufacturing consists of the production of specialty alloy steel and tapered roller bearing and components. Production is spread out over a 1200 acre site and is performed at 4 distinct plants: The Faircrest Steel Plant, Harrison Steel Plant Gambrinus Steel Plant, and the Gambrinus Roller Plant. The Timken Company SIC Code as identified on the Notice of Intent filed with this Agency as 3312. Under the MSGP you are identified with the Sector F(1) : Primary Metals.

Timken maintains separate storm water permit coverage utilizing the Industrial Multi-Sector General Stormwater (MSGP) Permit No. 3GR00394\*EG for all four Canton plants.

The last storm water compliance inspection was performed by this writer on March 17, 2010 where a review of all the outfalls was performed. This inspection covered some but not all of those outfalls, concentrating specifically on those selected for benchmark monitoring. Outfalls 21, 29, and 24 have been chosen. Outfall 21 represents most of the Faircrest Steel plant. Outfall 29 represents storm water that includes the scrap storage area at the Gambrius Steel plant. Outfall 24 represents the laydown yard associated with the Harrison Steel plant.

### **SWPPP Review**

A hard copy of the SWPPP was not present during the visit. An electronic version of the previous SWPPP was available for review. Rather than review the previous version it was decided that you would forward a copy of the updated version to me as soon as possible. It will be reviewed and comments provided. We did go over the records required to be kept by the permit. They are as follows with comments:

#### eDMR benchmark sampling

Sample results have not been reported as required by section 7.1 of the general permit. You can visit the following web site to facilitate this process: <https://ebiz.epa.ohio.gov/login.jsp>. Once the account has been created, update the record with the results obtained to date for outfalls 21, 29, and 24. These outfalls are to remain as your benchmark monitoring outfalls throughout the term of the permit, unless they significantly change in characteristics.

#### Inspections

Routine and Comprehensive site inspections are being conducted and documented. The individual plants are using different forms and it was suggested that you standardize the forms as much as possible for ease in review for your benefit as well as this Agency. A cursory review of the forms being used indicated that not all the required information is included within the forms. USEPA has excellent forms that can be found on their web site at: [http://www.epa.gov/npdes/pubs/industrial\\_swppp\\_guide.pdf](http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf). You can also refer to the MSGP sections 4.1. and 4.3 for the minimum state requirements.

#### Quarterly Visual Assessments

These assessments are being done on the outfalls and are well documented. As per section 4.2.3 of the permit you may choose substantially identical outfalls to be represented by one of the outfalls as long as they are rotated throughout the life of the permit.

Annual Report

The annual report was not available for review during the inspection. If the report has not been done you may find the form at the following web address: [http://www.epa.gov/npdes/pubs/msgp2008\\_appendixi.pdf](http://www.epa.gov/npdes/pubs/msgp2008_appendixi.pdf). Complete it for 2012 and forward a copy to me.

Training records

Training records are being maintained. Please forward a representative copy from one of the four plants for our records.

The storm water map for the facility should be updated to reflect any changes such as we found at outfall 36. This outfall contains the discharge from Marathon and therefore is not a representative station for Timken storm water. The outfall must be moved further upstream in the storm sewer where it no longer co-mingles with off-site storm water or any other waters not authorized by the MSGP. This same logic should be applied to all the listed storm water outfalls.

Should you have any questions concerning the information contained in this letter, please feel free to contact me at (330) 963-1136 or by e-mail at [phil.rhodes@epa.ohio.gov](mailto:phil.rhodes@epa.ohio.gov).

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water

PR:ddw