



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

July 26, 2013

**RE: Production Paint Finishers, Inc.  
Storm water Compliance Inspection**

Mr. Allen Francis  
Production Paint Finishers, Inc.  
P.O. Box 127  
Bradford, OH 45308

Dear Mr. Francis:

On June 21<sup>st</sup> I met with you and Mr. Joe Hollowell (with Ayer Quality Engineering) to conduct a storm water inspection of your facility. You were able to provide an unsigned copy of the storm water pollution prevention plan (SWP3) required by the permit; please sign the current plan and ensure subsequent versions are also signed and maintained on-site.

A review of your facility revealed that it is maintained in a clean and orderly manner with no apparent storm water issues related to industrial activity. I also found the monthly inspection checklist to be very appropriate. However, I ask that you review your SWP3 to ensure the comprehensive site inspection, required by section 8.AA.4.2 of the permit, includes roof areas.

Finally, we discussed your benchmark monitoring efforts (you currently have data from monitoring done in August 2012). This monitoring included hardness which is used to determine the benchmark value for zinc. Unfortunately, the hardness data was obtained from the storm water discharge instead of Ballinger Run which your storm water discharge is ultimately tributary to. As an alternative to arranging to do hardness monitoring, it would be appropriate to utilize data from Ohio EPA's 1999 *Biological and Water Quality Study of the Stillwater River Basin*. The average of the stream data that is most appropriate to your facility shows the hardness of Ballinger Run to be 262 mg/l. This value results in a benchmark value for zinc of 0.27 mg/l. Please let me know if you plan to utilize this hardness value and resulting benchmark value to determine the effectiveness of your SWP3.

If you have any questions about this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,

Matt Walbridge  
Environmental Specialist  
Division of Surface Water

MW/tf

ATTACHMENT

# Industrial Storm Water Reconnaissance Inspection Report

Name of facility: *Production Paint Finishers*

Address: *140 Center Street  
Bradford, OH 45308*

Permit number: *1GR01100\*DG*      Applicable permit sector: *AA2 - Fabricated Metal Coating and Engraving (Their SIC code is 3479)*

Date of visit: *June 21, 2013*      Time started: *9:10*      Time ended: *10:25*

Facility representative(s): *Mr. Allen Francis and Mr. Joe Hollowell*

OEPA inspector: *Matt Walbridge*

## SWP3:

- A. Did the facility representative produce an SWP3?      **Y / ~~N~~ / ~~Not requested~~**
- A1. Did it include a site map?      **Y / ~~N~~**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections?      **Y / ~~N~~**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection?      **Y / ~~N~~**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges?      **Y / ~~N~~**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done?      **Y / ~~N~~ / ~~NA~~**

## Comments:

- A – Not signed. Identified as version 0.**
- A1 – Does not identify roof vents or roof drainage.**
- A2 – Good quarterly visual inspection check list.**
- A4 – Does not include annual roof inspections.**
- A5 – They have been performing benchmark monitoring for Zinc and Nitrate + Nitrite Nitrogen**

## Inspection records:

- B. Were inspection records available?      **Y / ~~N~~**

## Comments:

Site Observations:

- C. Are materials stored exposed to weather? Y / ~~N~~  
If Yes, list materials.

***Aluminum oxide dust collector and storage bin.***

***Some metal equipment and scrap, but it is clean.***

- D. 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. ~~Y~~ / N / ~~Not sure~~

- E. Number of outfalls from site/number inspected: 1 / 1

- G. Did any show evidence of pollutants discharged in the storm water? ~~Y~~ / N

If yes, describe:

***Facility is generally clean and orderly***

- H. Other observations/comments:

***We did not get up onto the roof.***

***Benchmark Nitrate plus Nitrite Nitrogen value is 0.68 mg/l. August 2012 monitoring result was 0.244 mg/l. August 2012 zinc was 1.38 ug/l.***

***They have been monitoring the hardness of the stormwater discharge when they should be monitoring the hardness of the receiving stream.***

***Average hardness for Ballinger Run in that area is 262 mg/l (based on OEPA's 1999 monitoring data) which puts the benchmark for zinc at 0.27 mg/l***