



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

August 9, 2013

RE: LAKE COUNTY
CITY OF PAINESVILLE
INDUSTRIAL STORM WATER
AMERICAN ROLL FORMED
PRODUCTS
3GR01762*AG

NOTICE OF VIOLATION

Ryan Mohr
Environmental Health & Safety Manager
American Roll Formed Products
141 West Walnut Boulevard
Painesville, Ohio 44077

Dear Mr. Mohr:

On July 10 2013, Ohio EPA conducted an inspection at the American Roll Formed Products facility located at 141 West Walnut Boulevard. 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 #OH000005. The site's industrial activities are categorized by the Standard Industrial Classification (SIC) Code 3449: Fabricates Metal Products, except Machinery & Transportation Equipment, and Coating, Engraving & Allied Metals. This corresponds to Subsector AA1 in Part 8 of the NPDES permit. During the inspection, you, Ryan Mohr, represented American Roll Formed Products. I represented the Ohio EPA.

Storm Water Pollution Prevention Plan (SWPPP)

The facility currently has coverage under the Ohio EPA General NPDES Permit 3GR01762*AG. Our records show that the permit for your facility was issued October 1, 2012. Part 5 of the NPDES Permit requires one to create and implement a Storm Water Pollution Prevention Plan (SWPPP). During the inspection, your facilities' SWPPP was reviewed. While the facility did have a SWPPP present, it is important to make sure that all necessary parts that are listed in Part 5 of the NPDES Permit are included and followed throughout the site. Failure to do so will result in violations against the NPDES Permit.

Monitoring, Recordkeeping and Reporting

Ohio EPA reviewed recordkeeping associated with required site inspections and storm water monitoring. Our inspection revealed the following violations of the NPDES permit:

- **Failure to conduct Routine Facility Inspections once per quarter and maintain records of findings.** This is a violation of Part 4.1 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. American Roll Formed Products was only able to produce inspection records for the fourth quarter of 2012 to demonstrate compliance with this requirement. Please note that all missing inspections are individual violations.

- **Failure to conduct Quarterly Visual Assessments of storm water discharges and maintain documentation of the results.** This is a violation of Part 4.2.1 and 4.2.2 of the NPDES permit and ORC 6111.04 and 6111.07. For facilities continuing general permit coverage from previous generations, quarterly visual assessments were to begin no later than the third quarter of 2012. American Roll Formed Products has only conducted a quarterly visual assessment for the fourth quarter of 2012. A visual assessment must be conducted every quarter. A sample recordkeeping template is available on the Ohio EPA website at:

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

- **Failure to include an evaluation of non-storm water discharges and a certification that all unauthorized discharges have been eliminated.** This is a violation of Part 5.1.3.4 of the NPDES permit and ORC 6111.04 and 6111.07. Please evaluate storm water outfalls during a period of dry weather and evaluate facility drainage systems to ensure that there are no unauthorized non-storm water discharges from the facility. Evaluation may require dry weather screening, a review of construction drawings, smoke or dye testing and running a camera through storm sewer systems. Part 1.1.3 of the NPDES permit lists allowable non-storm water discharges. All other discharges must be authorized by an appropriate NPDES permit or eliminated. If not completed by the date of your response, please include a schedule by when this evaluation will be completed. Once completed, please submit (a) the non-storm water evaluation certification or (b) a list of unauthorized non-storm water discharges that remain and your plan for their elimination. The plan for elimination shall include the action to be taken and the date corrective action is expected to be completed.

In addition to these violations, Ohio EPA noted the following:

- The Comprehensive Site Evaluation had not yet been completed for reporting year October 1, 2012 to September 31, 2013. You were reminded that the inspection must be completed by September 31, 2013, and an Annual Report documenting your findings and corrective action must be completed and kept with the SWPPP. The Annual Report is to be completed using the form in Appendix I of NPDES Permit #OHR000005. Please submit a copy of the Annual Report for the reporting year October 1, 2012 to September 31, 2013, with your response to this Notice of Violation.
- There were no incidences of significant spills or leaks reported in the spill log. Our observation of the site indicates that there is significant potential for such incidences to occur and many oil stains were observed on the ground. Please note that any release of petroleum-based product of 25 gallons or more on the ground or a spill that results in sheen on a water of the state is a reportable quantity and must be listed as a significant spill or leak.

American Roll Formed Products has conducted any benchmark monitoring for the 4th quarter of 2012. Please note that at least four benchmark samples must be taken before the end of Year 3 of the NPDES permit, i.e., December 31, 2014. At least one benchmark sampling must be taken during each of the quarterly monitoring periods stipulated in Part 6.1.7 of the NPDES permit. For parameters that are hardness-dependent, please refer to Appendix J for how to determine the hardness value of the receiving stream. Results of benchmark monitoring must be reported to Ohio EPA within 30 days of receiving results from the lab. Results must be reported using Ohio EPA's e-DMR system. Information on setting up an account is available at www.epa.ohio.gov/dsw/edmr/eDMR.aspx.

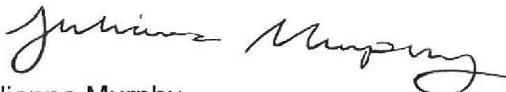
Site Inspection

- All dumpsters outside of the facility must remain covered at all times. It was explained that the covers are taken off during use, but they are covered with the red lids at night and during a rain event. Be sure that this is actually happening to make sure there is no risk of storm water pollution. **(See Fig 3)**
- The pallets stored outside can hold residuals which can potentially be a pollutant. It is suggested to keep these under cover or inside to eliminate the chance of pollution. This also goes for the scrap rusted metal. These could either be painted or stored under covering. **(See Fig 1 & 2)**
- There are two drains in the area of the Shipping & Receiving Garage. This is a high risk area for pollution so the most appropriate and efficient Best Management Practices (BMPs) need to be put into place to eliminate the chance of storm water pollution. **(See Fig 4 & 6)**
- If a pollution problem were to occur, the roof could be a likely cause. Since parts of the roof were rusty, the storm water runoff from the roof could be the cause of some of the possible pollution. I only mentioned this as something to keep your eye on if a problem were to arise. **(See Fig 5)**

I will not be in the office at the time of your response so please provide a letter of response, directed to Dan Bogoevski, indicating the actions you will take to address the concerns and violations involving industrial storm water noted above. Please provide him with a letter of response no later than **August 27, 2013**.

If you should have any questions concerning this letter, feel free to contact Dan Bogoevski at (330) 963-1145 or by e-mail dan.bogoevski@epa.ohio.gov.

Sincerely,



Julianna Murphy
Assistant to the District Engineer
Division of Surface Water

JM:bo

cc: Michelle Tressmer, U.S. Compliance Corporation

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