



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

August 9, 2013

RE: CUYAHOGA COUNTY
VILLAGE OF CUYAHOGA HEIGHTS
INDUSTRIAL STORM WATER
THOMPSON ALUMINUM CASTING CO.
3GR01801*AG

Dave Oberg
Thompson Aluminum Casting Co.
5161 Canal Road
Cuyahoga Heights, OH 44125

NOTICE OF VIOLATION

Dear Mr. Oberg:

On July 16, 2013, Ohio EPA conducted an inspection at the Thompson Aluminum Casting Co. facility located at 5161 Canal Road. 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 3363: Nonferrous Foundries (castings). This corresponds to Subsector F4 in Part 8 of the NPDES permit. During the inspection, Dave Oberg represented Thompson Aluminum Casting Co. Dean Stoll and I represented the Ohio EPA.

Storm Water Pollution Prevention Plan (SWPPP)

The facility currently has coverage under the Ohio EPA General NPDES Permit 3GR01801*AG. Our records show that the permit for your facility was issued on November 1, 2012. During this time the permit was in the process of being updated. This updated Permit consists of new requirements. The permit requires multiple inspections and assessments that focus on the areas of the facility where the storm water runoff leaves the site, outfalls. While inspecting the site, we found three total outfalls. One was the concentrated flow off the northeast corner of the lot that drained the flow coming off the founders sand stock piles. **(See Fig 1 &2)** The second was the sheet flow off of the east side of the lot that flows towards the parks paved road. **(See Fig 3&4)** And finally, the third was the southeast edge of the lot sheet flow that consists of the employee parking lot and the trucks entrance. This outfall drains directly into your neighbors back lot. These outfalls, among other things, will be focused on in the assessments and inspections. The required documents should be kept within your Storm Water Pollution Prevention Plan (SWPPP).

Part 5 of the NPDES Permit requires one to create and implement a SWPPP. During the inspection, the facility did not have a SWPPP present, it is important to make sure that you create a SWPPP with all necessary parts that are listed in Part 5 of the NPDES Permit and that is the SWPPP is 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 prepare a SWPPP before submitting the NOI and have it readily available on site.** This is a violation of Part 5 of the NPDES Permit. Prepare a SWPPP containing all the required information in Part 5 of the NPDES Permit. Be sure to have the SWPPP available on site at all times to comply with Part 5.3 of the NPDES Permit.
- **Failure to prepare and obtain a Site Description.** This is a violation of Part 5.1.2 of the NPDES Permit. This site description shall contain all of the following:
 - All existing structural control measures
 - All storm water conveyances including ditches, pipes, and swales
 - Potential pollutant sources
 - Where significant spills or leaks have occurred
 - All storm water monitoring points
 - Storm water inlets and outfalls, with a unique identification code for each outfall, indicating if you are treating one or more as “substantially identical”, and an approximate outline of the areas draining into each outfall
 - All non-storm water discharges including a description of each
 - Fueling stations, vehicle and equipment maintenance and/or cleaning area, loading/unloading area, areas used for treatment, storage, or disposals of water, liquid storage tanks, processing and storage areas, immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility, transfer areas for substances in bulk, and machinery
 - Run-on to your site from adjacent property that contains significant quantities of pollutant including the sources
 - Municipal separate storm sewer systems, where your storm water discharges to them
- **Failure to conduct an annual Comprehensive Site Inspection and complete an Annual Report.** This is a violation of Part 4.3.1 and 7.2 of the NPDES permit and ORC 6111.04 and 6111.07. Thompson Aluminum Casting Co. was unable to locate an Annual Report summarizing the findings of the comprehensive site inspection and corrective action taken for 2012 or any year prior (this was known as the Comprehensive Site Evaluation in previous generations of the general permit). Thompson Aluminum Casting Co. is to utilize the Annual Report form located in Appendix I of the NPDES permit and keep a copy of the report with the SWPPP. The report is to be made available to Ohio EPA upon request. A Comprehensive Site Inspection and Annual Report must be completed by October 31, 2013, for the current reporting year.
- **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. Thompson Aluminum Casting Co. was unable to produce inspection records to demonstrate compliance with this requirement.

- **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. Thompson Aluminum Casting Co. has not conducted any quarterly visual assessments to date. 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 conduct employee training at least once per year and maintain documentation such as training materials and attendance records.** This is a violation of Part 2.1.2.9 and 7.5 of the NPDES permit and ORC 6111.04 and 6111.07. Thompson Aluminum Casting Co. was unable to produce training records to demonstrate that any employee training had occurred. Training must be more frequent for business with high employee turnover. Please be aware of training tapes that can be obtained through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) by contacting Tamara Girard at (330) 963-1200 as well as presentations available at www.epa.gov/npdes/training.
- **Failure to include in the SWPPP 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. 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 November 1, 2012 to October 31, 2013. 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 November 1, 2012 to October 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 a sheen on a water of the state is a reportable quantity and must be listed as a significant spill or leak.

- Thompson Aluminum Casting Co. has not conducted any benchmark monitoring to date. 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. Your facility is required to monitor for Total Copper and Total Zinc. 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

1. In the back lot there was an uncovered dumpster that was also leaking onto the site. All dumpsters must be covered and inspected regularly for any leaks or cracks. **(See Fig 5 & 6)**
2. The storm drain in the back had sediment and trash built up around it. Best Management Practices (BMPs) need to be put into place to keep the pollution out of the drains. **(See Fig 7)**
3. The trench drain had trash, cigarette butts, and sediment inside and around it. Good housekeeping practices along with BMPs need to be set in place to keep the situation from worsening and from happening in the future. **(See Fig 8 & 9)**
4. The slag was stored in open, broken, rusted barrels on site. The slag was observed to be exposed to storm water while also spilling out of the barrels. Better containment needs to be set into place to keep the storm water out of contact with the slag. **(See Fig 10 & 11)**
5. Containment also needs to be set around the foundry sand stock piles to keep it from polluting the storm water runoff. **(See Fig 12)**
6. The stock piles on the east side of the lot need to either have a berm installed around them or covered to keep the storm water from reaching them and washing the sediment away and into the receiving stream. **(See Fig 13)**
7. Residuals can be stored on the pallets which can potentially lead to a pollution problem. The stock piles of pallets can be kept under a covering to help eliminate this possibility. **(See Fig 14)**
8. The stored metal scrap on the northeast corner of the lot was observed to be old and rusty. When this gets hit with storm water it can wash residuals and rust away with it. It is recommended to either paint these to avoid the rust or store them under a type of covering to eliminate storm water contact. **(See Fig 15)**
9. There was a sand spill on the lot by the sand containers. Sediment is a pollutant. To avoid this pollution problem be sure to sweep up spills as they happen. **(See Fig 16)**

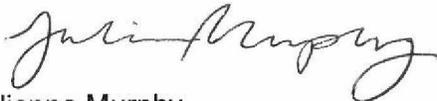
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10. One of the trucks on site was leaking some sort of fluid. These spills need to be cleaned up instantly. If a truck is suspected to have a leak, a drip pan would be a good precautionary action to avoid a potential pollution problem. **(See Fig 17)**

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

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.state.oh.us.

Sincerely,



Julianna Murphy
Assistant to the District Engineer
Division of Surface Water

JM:ddw

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

THOMPSON ALUMINUM CASTING CO
Cuyahoga Heights Cuyahoga County

Photos Taken: July 16, 2013
By: Julianna Murphy, DSW, NEDO



Figure 1: The area draining to the outfall on the northeast corner of the lot.



Figure 2: The concentrated flow to the outfall on the northeast corner of the lot



Figure 3: The area that sheet flows to outfall on the east side of the lot.



Figure 4: The east edge of the lot that sheet flows onto the parks property.



Figure 5: (left) The dumpster in the back lot was leaking. Since dumpsters are a source of possible pollutants, they should be inspected regularly.



Figure 6: Uncovered dumpster



Figure 7: Sediment and trash making its way into the storm drain.



Figure 8: Trench drain in the truck's shipping and receiving area filled with trash and sediment.

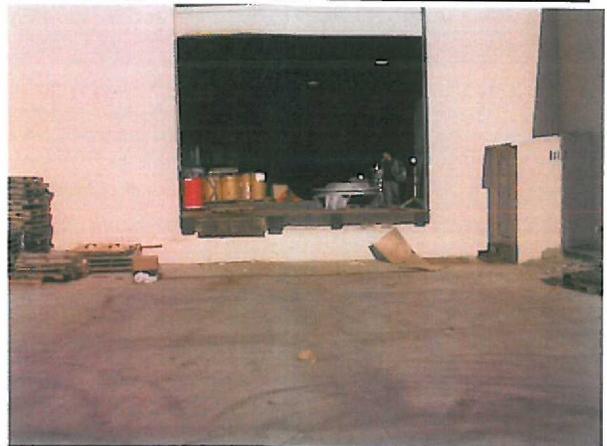


Figure 9: The area draining into the trench drain in the truck's shipping and receiving, good housekeeping is needed.



Figure 10: (left) Open piles of slag in old, rusted, broken barrels and spilled over the sides.

Figure 11: (right) broken barrels containing slag.

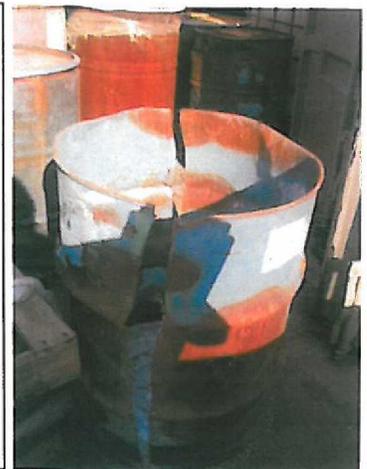




Figure 12: Foundry sand runoff directly toward outfall



Figure 13: Stock piles that need containment



Figure 14: Pallet stock piles



Figure 15: Metal scrap stock piles



Figure 16: Spilt sand from containers.



Figure 17: Leaking truck on site.