



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Ms. Julie Smoak
Environmental Manager
Toyota Tsusho America
702 Triport Road
Georgetown, Kentucky 40324
Julie_Smoak@taiamerica.com

Re: Compliance Evaluation Inspection Report
NPDES Permit No. KY0110060

Dear Ms. Smoak:

The U.S. Environmental Protection Agency, Region 4 and the Kentucky Division of Water conducted a Compliance Evaluation Inspection (CEI) of the Toyota Tsusho America, Inc. industrial storm water system on July 28, 2021. The objective of the inspection was to assess the permittee's compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit. The inspection results have been summarized in the enclosed CEI Report.

The EPA appreciates your cooperation. If you have specific questions about the inspection report, please contact Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov. Please verify receipt of this letter and report by emailing Mr. Ammons at the email address provided.

Sincerely,

**JAIRO
CASTILLO**

Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Digitally signed by
JAIRO CASTILLO
Date: 2021.10.20
16:12:46 -04'00'

Enclosure

cc: Constance Coy, constance.coy@ky.gov
Kentucky Division of Water

**United States Environmental Protection Agency Region 4
Enforcement and Compliance Assurance
Division**

Water Enforcement Branch

61 Forsyth Street, SW
Atlanta, Georgia 30303



Compliance Evaluation Inspection Report

Toyota Tsusho America, Inc.
NPDES Permit: KY0110060
Project No. CV-KY0110060-072821

702 Triport Road
Georgetown, KY 40324

Inspection Date: July 28, 2021

Inspectors:
Brad Ammons, EPA Region 4
Dennis Sayre, EPA Region 4
Deborah Singleton, KY Division of Water
Jarrod Jones, KY Division of Water

Inspection Report Prepared by: Brad Ammons

October 18, 2021

Title and Approval Sheet

Title: Compliance Evaluation Inspection Toyota Tsusho America, Inc.

Approving Official:

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.10.20
16:13:16 -04'00'

10/20/2021

Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Date

Enforcement Officer:

10/20/2021

Brad Ammons, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

Date

COMPLIANCE EVALUATION INSPECTION REPORT
Toyota Tsusho America, Inc., Project No. CV-KY0110060-072821

Table of Contents

1. INTRODUCTION.....	3
2. PARTICIPANTS.....	3
3. FACILITY DESCRIPTION	3
4. INSPECTION PROCEDURES.....	3
5. FINDINGS AND CONCLUSIONS	3
6. PERMIT	4
7. RECORDS AND REPORTS	4
8. SAMPLING	5
9. DISCUSSION	5
10. ATTACHMENTS	5

COMPLIANCE EVALUATION INSPECTION REPORT
Toyota Tsusho America, Inc., Project No. CV-KY0110060-072821

1. INTRODUCTION

The U.S. Environmental Protection Agency, Region 4 and the Kentucky Division of Water (KDOW) conducted a Compliance Evaluation Inspection (CEI) at the Toyota Tsusho America, Inc. (Toyota) facility (Facility) located at 702 Triport Road in Georgetown, Kentucky on July 28, 2021. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This narrative report and attachments present the results of the inspection.

2. PARTICIPANTS

<u>Name</u>	<u>Position</u>	<u>Phone Number</u>
Brad Ammons	EPA Inspector	404-562-9769
Dennis Sayre	EPA Inspector	404-562-9756
Deborah Singleton	KDOW Inspector	502 564-3410
Jarrold Jones	KDOW Inspector	502 564-3410
Julie Smoak	Environmental Manager	859-209-0438
Ted Malin	Facility Maintenance & Security	859-537-2501
Nicole Galavotti	Shield Environmental	859-294-5155

3. FACILITY DESCRIPTION

The Facility discharges industrial storm water collected from the 76-acre site. In 2005, the Facility was switched from a general storm water permit to an individual storm water permit because of the “green metal” building and metal storage area. There are two storm water detention ponds on-site.

4. INSPECTION PROCEDURES

The overall objective of this CEI was to evaluate the condition and operational performance of the Facility’s industrial storm water best management practices, storm water collection system and the permittee’s self-monitoring program and offer compliance assistance as needed. Specific tasks included an opening conference, conducting an interview with the Facility management, reviewing Discharge Monitoring Reports (DMRs) and other records, conducting a site visit, and a closing conference.

5. FINDINGS AND CONCLUSIONS

(Refer to Attachment 1 for cited photographs)

- Outfalls 003, 005 and 006 are monitored quarterly and outfalls 004 and 007 are monitored monthly.
- In 2018, Toyota had all the underground pipes assessed by cameras (closed circuit television (CCTV)) and in 2019/2020 bid contracts to rehabilitate all the pipes.
- In April 2020, a sinkhole in the area that drains to Outfall 004 was discovered. Outfall 004 is east of the Green Metals, Inc’s building (see Figure 1. below). The sinkhole was approximately 50’ long and 6’ deep. An area of vegetation approximately 300’ long and 50’ wide was cleared to fill in the sinkhole and surrounding area with an estimated 400 tons of limestone riprap. See photo of rehabilitated sinkhole area looking toward outfall 004 (Photo 2)
- The Facility exceeded the Total Suspended Solids (TSS) permit limit for Outfall 004 in 4th quarter

COMPLIANCE EVALUATION INSPECTION REPORT
Toyota Tsusho America, Inc., Project No. CV-KY0110060-072821

2018, 2nd quarter 2019, 4th quarter 2020, 1st quarter 2021, and 2nd quarter 2021. The latter three quarters of exceedances occurred during the excavation and remediation of the sinkhole.

- The Facility exceeded the Oil and Grease permit limit for Outfall 004 in 4th quarter 2018. The Facility representative had no explanation for the Oil and Grease (O&G) exceedance but noted there is an employee parking lot that drains to Outfall 004.
- The Facility exceeded the TSS permit limit for Outfall 003 (Photo 4) in 4th quarter 2018. No explanation for this exceedance was given.
- The Facility also exceeded the TSS permit limit for Outfall 005 in 1st quarter 2019 and 1st quarter 2021. The Facility representative noted that they had completed rehabilitation of the detention basin upstream of Outfall 005 because it was heavily vegetated, and the inlet and outlet structures were too close to each other. This work was completed in 2020/2021.



Figure 1. Facility outlay map.

6. PERMIT

The National Pollutant Discharge Elimination System (NPDES) permit number KY0110060 (Permit) became effective on October 1, 2019 and the Permit expires on September 30, 2024.

Pollutants of interest in the Permit include pH, TSS, and Oil & Grease. The Facility is permitted to discharge industrial storm water into an unnamed tributary of Dry Run.

7. RECORDS AND REPORTS

A review of EPA's Enforcement and Compliance History Online (ECHO) website shows the Facility to be in Significant Non-compliance (SNC) for TSS exceedances at Outfall 004 for 4th quarter 2020, 1st quarter 2021 and 2nd quarter 2021. Tables 1 below is a summary of NPDES effluent limit exceedances.

COMPLIANCE EVALUATION INSPECTION REPORT
Toyota Tsusho America, Inc., Project No. CV-KY0110060-072821

Table 1. Effluent limit exceedances from July 1, 2018 to June 30, 2021.

Outfall	Parameter	Monitoring Frequency	Effluent Exceedance
003	TSS	Quarterly	4 th quarter 2018
004	TSS	Monthly	October 2018 (160% over limit)
004	TSS	Monthly	November 2018 (11% over limit)
004	TSS	Monthly	May 2019 (3% over limit)
004	TSS	Monthly	October 2020 (85% over limit)
004	TSS	Monthly	November 2020 (104% over limit)
004	TSS	Monthly	January 2021 (753% over limit)
004	TSS	Monthly	February 2021 (59% over limit)
004	TSS	Monthly	March 2021 (59% over limit)
004	TSS	Monthly	April 2021 (28% over limit)
004	TSS	Monthly	May 2021 (210% over limit)
004	TSS	Monthly	June 2021 (210% over limit)
004	O&G	Monthly	November 2018 (17% over limit)
005	TSS	Quarterly	1 st quarter 2019

8. SAMPLING

Shield Environmental conducts sampling for TSS, Oil & Grease, and pH. Records reviewed include DMRs and Chain of Custody forms, which appeared to be in good order.

9. DISCUSSION

The facility has already rehabilitated the area that drains to outfall 004 to address the TSS permit limit exceedance. No further action is warranted.

10. ATTACHMENTS

1. Photographs
2. EPA ECHO printout

END REPORT



Photo 1: Inlet to Outfall 004.



Photo 2: Remediated area upstream of Outfall 004.



Photo 3: Outfall 004 (to Dry Run).



Photo 4: Outfall 003 (in detention basin).

Customize Report

Facility Summary

Facility/System Characteristics

Enforcement and Compliance

Environmental Conditions

Pollutants

Community

Statute	Program/Pollutant/Violation Type				QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	
CWA (Source ID: KYR001899)					07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-09/30/19	10/01-12/31/19	01/01-03/31/20	04/01-06/30/20	07/01-09/30/20	10/01-12/31/20	01/01-03/31/21	04/01-06/30/21	
	Facility-Level Status				Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit
	Quarterly Noncompliance Report History																
CWA (Source ID: KY0110060)					07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-09/30/19	10/01-12/31/19	01/01-03/31/20	04/01-06/30/20	07/01-09/30/20	10/01-12/31/20	01/01-03/31/21	04/01-06/30/21	
	Facility-Level Status				Violation Identified	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	
	Quarterly Noncompliance Report History				Other Violation	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Effluent - Monthly Average Limit	Effluent - Monthly Average Limit	Effluent - Monthly Average Limit	
	Pollutant	Disch Point	Mon Loc	Freq	Effluent Limit Violations												
► CWA	Solids, total suspended E	003 - 1	Effluent Gross	Mthly		175%											
► CWA	Solids, total suspended	003 - 1	Effluent Gross	NMth		38%											

Customize Report		Facility Summary			Facility/System Characteristics			Enforcement and Compliance		Environmental Conditions		Pollutants		Community		
▶ CWA	total suspended E	003 - 1	Effluent Gross	NMth		38%										
▶ CWA	Oil & Grease E	004 - 1	Effluent Gross	Mthly		17%										
▶ CWA	Solids, total suspended E	004 - 1	Effluent Gross	Mthly		160%	3%	SNC Violations →						104%	753%	210%
▶ CWA	Solids, total suspended E	004 - 1	Effluent Gross	NMth		30%								2%	327%	55%
▶ CWA	Solids, total suspended E	005 - 2	Effluent Gross	Mthly											18%	
▶ CWA	Solids, total suspended E	005 - 1	Effluent Gross	Mthly			103%									
▶ CWA	Solids, total suspended E	005 - 1	Effluent Gross	NMth			87%									