



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

October 21, 2008

Re: Guernsey County
Metallurg Vanadium
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. David White, Technical Manager
Metallurg Vanadium
P.O. Box 310
Cambridge, Ohio 43725-0310

Dear Mr. White:

On October 7, 2008, I conducted a Compliance Evaluation Inspection (CEI) at the Metallurg Vanadium facility in Cambridge. The inspection was conducted with Susan Harrier, Environmental Manager with Metallurg Vanadium and Amy Kidd with August Mack Environmental. The purpose of the inspection was to determine compliance with the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) Permit Number 01100018*BD and review the installation of flow meters throughout the wetland to conduct a hydrologic study of the wetland system for the ecological assessment.

Metallurg Vanadium's NPDES permit covers the discharge from three storm water discharge points. The condition of the three outfalls was evaluated during the CEI as well as the characteristics of the effluent. At the time of the inspection the three storm water outfalls appeared to be in satisfactory condition and no discharge was observed. A more detailed description of all three outfalls and the conditions observed are noted below.

Outfall 001 located northwest of the Raw Material Receiving/Storage (RMRS) building collects storm water runoff flowing from the southwest side of the Mill building in addition to runoff flowing from the northeast side of the building along the railroad ditch into the engineered retention pond. The drainage basin for Outfall 001 consists primarily of concrete travel areas and the active slag pile west of the RMRS. The active slag area is an excavated area approximately 10' below grade with a sloped open end which should be bermed near the entrance to prevent surface runoff from entering the pit. At the time of my inspection, there was some slag located just outside of the entrance and more effort should be made to place slag within the pit past a newly constructed berm. The newly graded ditch and adjacent area around the fenced area should be reseeded. During the inspection, the outfall had no discharge and well established vegetation was present in the wetland.

Outfall 002 collects storm water runoff from the southeast corner of the production facility, Outfall 602 and potential cooling tower overflows located northeast of the Mill building. According to Ms. Harrier, construction has begun near the old RCRA storage pad, Outfall 602, which will eventually eliminate the pad. Once the pad is eliminated due to the construction, reporting for Outfall 602 shall continue with the reporting of "AL" for no discharge. Wetland vegetation consisted of primarily narrow leaf cattails throughout the wetland with some other common emergent vegetation. At the time of my inspection, no water was observed in the final cell near the weir.

Outfall 003 collects storm water runoff from the chemical pilot plant which is located southwest of the east slag pile and south of the railroad. The pilot plant is occupied on a non-routine basis and consists of one building which is used for pilot testing of finished products. The area north of the pilot building slopes north to the ditch along the railroad tracks and drains westward into an unnamed tributary that drains north under the railroad to Outfall 003. The outfall drains into a natural wetland which has intermediate sheet flow throughout and a final discharge into Chapman Run greater than a few hundred yards to the northwest. At the time of the inspection the unnamed tributary to Outfall 003 had little discharge which was clear and free of suspended solids. During my inspection it was instructed to Ms. Harrier that sampling should take place at Outfall 003 only when discharge is observed at Outfall 002 to indicate potential runoff from the pilot plant impervious area.

As a condition of the current permit an ecological assessment is being conducted to determine the affect of Vanadium and Molybdenum on the wetland. In order to determine pollutant loadings into the wetland a hydrologic study is being conducted by Conestoga Rovers & Associates according to the approved ecological study. During my inspections, multiple flow meters were being installed near the three outfalls and other locations throughout the wetland which will accurately monitor flows into the wetland. At the time of my inspection, the facility was found to be in substantial compliance with the permit and work relating to the ecological assessment appeared on task. A copy of my inspection report is attached for your review.

If you have any questions, please feel free to call me at (740) 380-5416.

Sincerely,



Jake Greuey
Environmental Specialist II
Division of Surface Water

JG/dh

Enclosure

- c: Richard Caldwell, Metallurg Vanadium, HSE Manager
- c: Susan Harrier, Metallurg Vanadium, Environmental Manager
- c: Amy Kidd, Staff Scientist, August Mack Environmental

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01100018*BD	OH0114847	October 7, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Metallurg Vanadium P.O. Box 310 Cambridge, Ohio 43725	8:40 a.m.	April 1, 2002
	Exit Time	Permit Expiration Date
	11:10 a.m.	March 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Susan Harrier, Environmental Manager	
Name, Address and Title of Responsible Official	Phone Number
David White, Technical Manager P.O. Box 310 Cambridge, Ohio 43725-0310	(740) 432-6345 ext 255

C. AREAS EVALUATED DURING INSPECTION

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> * Laboratory	<input type="checkbox"/> Compliance Schedules
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Sludge Storage/Disposal	<input type="checkbox"/> Other
<input type="checkbox"/> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

* Contract Laboratory used and not evaluated.
See attached letter.



 Jake Geuey, Inspector, Ohio EPA, Southeast District Office

10/21/08

 Date



 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

10/22/08

 Date