



State of Ohio Environmental Protection Agency

**Northeast District Office**



2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

July 19, 2007

RE: COLUMBIANA COUNTY  
CITY OF EAST PALESTINE  
TUBETECH, INC.  
900 EAST TAGGART STREET

Mr. Stephen D. Oliphant, Pres.  
Tubetech, Inc.  
900 East Taggart Street  
East Palestine, OH 44413

Dear Mr. Oliphant:

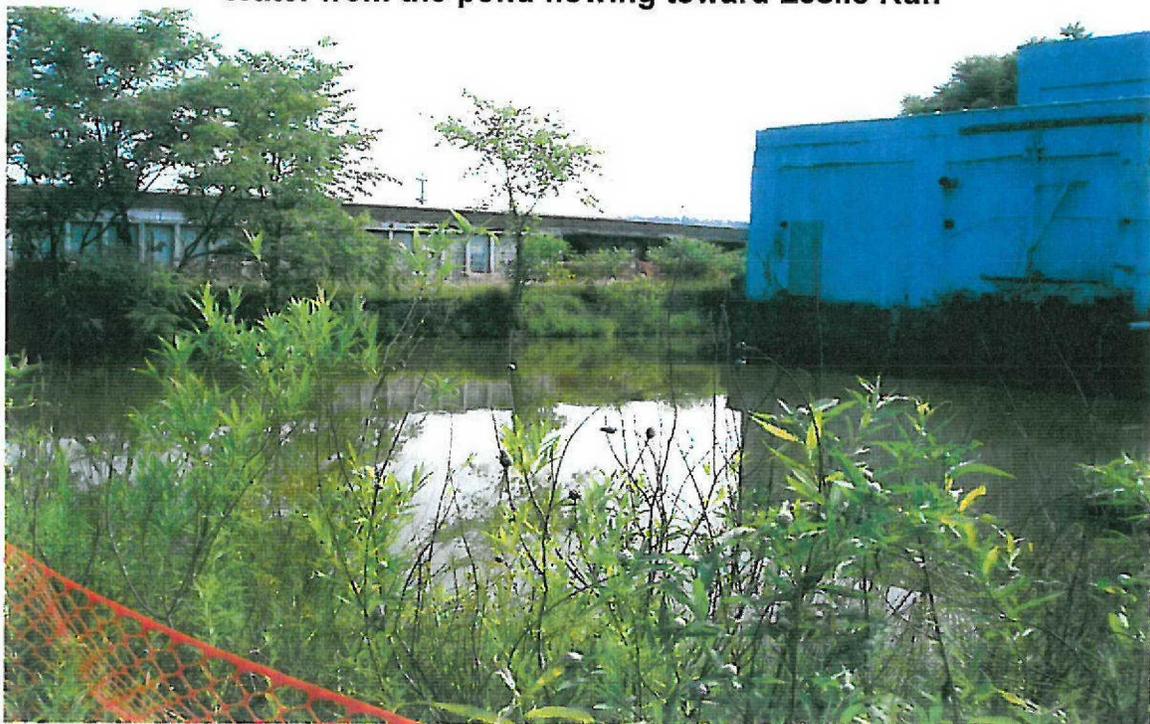
On June 26, 2005, this writer conducted an inspection of Tubetech, Inc., located at 900 East Taggart Street, East Palestine, Ohio. The purpose of the inspection was to review the water pollution control facilities and evaluate compliance with the facilities NPDES permit. The following was observed at the time of the inspection:

- 1) The facility currently uses well water in the heat exchanger for three mills. The well water passes through the heat exchanger and then discharges to Leslie Run.
- 2) Contact water at the mills is recycled. Each system is equipped with oil removal and settling. Wastes from the recycle systems are hauled off site by Castle Environmental.
- 3) A review of the last five years monthly operating report data revealed that no effluent violations have occurred during that time. However, there have been monitoring violations for Flow (July 2006). This facility is in non-compliance for failing to comply with the monitoring requirements of its NPDES permit.
- 4) We note that there is still a RCRA unit on the west side of the building. At the time of the inspection, a path between this unit and Leslie Run appeared to carry overflow from the pond to the creek. A release of pollutants from this pond would be an unauthorized discharge to waters of the state.

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**Water from the pond flowing toward Leslie Run**



**RCRA Impoundment**

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This would be a violation of the Ohio Revised Code, Chapter 6111, for a discharge of pollutants without a permit. The schedule of the new permit required a study over the course of the previous year to determine if pollutants are being released from this unit. If at any time a discharge occurs throughout the year, at least one sample per month must be collected to be analyzed for chromium (total recoverable), zinc (total recoverable), and cyanide (free). A minimum of twelve samples should be collected throughout the year. Any actions that would divert all sources of water, both surface and storm, to the pond, must be carried out to insure there is no discharge. This will eliminate the need for a new outfall and monitoring to be placed in the new NPDES permit.

This facility is also in non-compliance for failing to comply with the schedule of its' permit. Please respond in writing, by August 3, 2007, as to how the above deficiencies will be addressed. It is our understanding that the pond will be eliminated in the near future. The plan that outlines the study to eliminate any discharge from the RCRA unit must address this closure and verification that no pollutants were discharged. The plan must be submitted by August 31, 2007. The appropriate monitoring for the NPDES permit must begin immediately.

Should you have any comments or concerns regarding this letter, please feel free to contact me at (330) 963-1193.

Respectfully,

  
Joseph E. Trocchio  
Environmental Engineer  
Division of Surface Water

JET:bo

cc: Rick Downey, Tubetech

ec: Ronald Bell, Enforcement Coordinator, NEDO, DSW

File: Industrial/Permit Compliance/Tubetech