

Ohio

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1IN0026120080602

SHELBY

ROSS ALUMINUM CASTINGS

WALBRIDGE, MATT | 2008/06/02



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

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

May 30, 2008

RE: NPDES Compliance/Pre-permit Inspection and
Notice of Violation

Ms. Shannon Francis
Ross Aluminum Foundries
PO Box 609
Sidney, OH 45365-0609

Dear Ms. Francis:

On May 19th I met with you and Ms. Cheryl Arkenberg to conduct a compliance evaluation inspection in preparation for renewal of your NPDES permit that expired on April 30, 2008. A compliance review going back to January 2005 revealed that Ross Aluminum violated its NPDES permit for failing to monitor and for exceeding effluent limits. A summary of the violations is attached to this inspection.

While it would normally be necessary for you to explain the reporting and effluent limit violations and how you plan to keep them from recurring, I believe the concern has been made moot by the apparent elimination of the non-stormwater discharges. During the inspection I noted that the cooling water discharge associated with the heat exchanger was all but eliminated by the installation of a cooling tower system that you said was installed in July 2007. You stated that this cooling tower does not discharge to the storm sewer. This would certainly explain why flows were reported to be zero from that time until January 2008 with reporting codes AC (plant not operating) or AN (plant not staffed) used since then.

What remains is a very small flow of air compressor condensate that is currently being treated by an oil separator and a simple system that was stated to be for removing copper associated with water from an air drier scheduled to be eliminated very soon. Flow was limited to essentially drips although the flow at the sampling manhole was notably greater. I speculated as to whether the flow in the relatively deep storm sewer might be from groundwater infiltration, but I ask that you try to determine the source of the observed flow. This should include a verification that blowdown from the cooling tower does not discharge to the storm sewer.

It is necessary for you to confirm that the drain to which the air compressor condensate discharges to is tributary to the storm sewer that runs parallel to the building. This could be accomplished by viewing plumbing diagrams or by dye testing. If dye testing is to be done, please notify this office prior to doing the test and make sure to use only enough dye to discern whether a connection exists. You may be able to do a test with plain water if the water flow in the sampling manhole is low so as to allow you to observe a change in flow rate. Please submit your findings to this office by July 14, 2008.

If the air compressor condensate discharge to the storm sewer can be eliminated through re-plumbing or use of an evaporator, the discharge of once-through cooling water from the heat exchanger as back-up for the cooling tower should it be out of service is all that remains. If you are able to eliminate all non-stormwater discharges to Tilberry Run, your NPDES permit could be eliminated leaving you eligible for coverage under the Industrial Storm Water General Permit.

Ms. Shannon Francis
May 30, 2008
Page 2

With regards to storm water, I found Ross Aluminum to also be in non-compliance with the requirements of Parts IV, V, and VI of your NPDES permit. Specifically:

- You were not able to provide a signed copy of a Storm Water Pollution Prevention Plan (SWP3) as required in Part IV(B)(1) and (2)
- There was no site drainage map available as required by Part IV(D)(2)(a)(1). Such a map needs to identify all types of material storage as outlined in Part IV(D)(2)(b).
- There were no annual monitoring results required by Part IV(D)(3). Monitoring is required for Oil & Grease, BOD, COD, TSS, duration of storm event, precipitation amount, duration between previous storm event, estimated volume, lead, cadmium, copper, arsenic and chromium. Annual monitoring results are required to be incorporated into the SWP3.
- There were no annual reports summarizing inspection activities and observations as required by Part IV(D)(4)(c). These summaries determine the effectiveness of the SWP3 and identify the need for any necessary updates.

It is necessary for Ross Aluminum to conduct a comprehensive evaluation of its SWP3 addressing all the requirements in Parts IV, V and VI of your NPDES permit, especially those items listed above. Please note that the evaluation must consider the roof areas of foundry buildings.

Findings from your evaluation, resulting in a signed, updated SWP3 should be submitted to this office by July 14, 2008. Please include a summary of all annual storm water monitoring results of required by the permit.

If you have any questions concerning this inspection letter or attachments, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

Attachments

ATTACHMENT

Summary of reporting and limit violations for Ross Aluminum Foundries 815 North Oak Avenue, Sidney, Ohio

Reporting Violations

Monitoring Results Lacking for:						
	Temperature	Flow Rate	Oil and Grease	Methyl Blue Active Substances	Aluminum	Copper
	(weekly monitoring required)		(required monthly)	(required once per quarter)		
2005	July 8 - 14					
	July 22 - 28					
	September 8 - 14					
	September 15 - 21					
	October 8 - 14					
2006	December 22 - 28			August	August	August
2007	January 22 - 28	September 22 - 28	October			
	September 22 - 28					
2008		January 1 - 31 (4 weeks)	February March	March	March	March

Effluent Limit Violations

Violation Date		Parameter (limit)			Reported Value
		Temperature (Daily Max Limit)	Temperature (Monthly Avg.)	pH (Min.)	
2005	September 26			6.5	5.9
2006	July 31	85°F			87
	November 2	70°F			75
	November 13				72
	November 17				76
	November 27				78
	Nov. 2006			65°F	
	December 1	70°F			72
	December 11				76
	December 18				71
	Dec. 2006		65°F		72.25
2007	January 29	70°F			71
	October 15			6.5	5.82
	July 14				6.44
	July 21				6.35
2008	January 8				6.19



Ohio Environmental Protection Agency

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
1IN000261*BD	OH0123081	5-19-08	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Ross Aluminum Foundries 815 N. Oak Avenue Sidney, OH 45365-0609	1000	5-1-03
	Exit Time	Permit Expiration Date
	1220	4-31-08
Name(s) and Titles of On-Site Representative(s)	Phone Number(s)	
Shannon Francis – System Administrator	(937) 498-5773	
Cheryl Arkenberg – Environmental & Safety Coordinator (w/ Ross Casting & Innovation)	(937) 497-4500 ext. 2136	
Name, Title and Address of Responsible Official:	Phone Number	
Shannon Francis – System Administrator Ross Aluminum Foundries PO Box 609 N. Oak Avenue Sidney, OH 45365-0609	(937) 492-4034 ext. 1137	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)

S Permit	NA Flow Measurement	NA Pretreatment
U Records/Reports	NA Laboratory	NA Compliance Schedules
S Operations & Maintenance	S Effluent/Receiving Waters	U Self-monitoring Program
S Facility Site Review	NA Sludge Storage/Disposal	U Other (Stormwater)
NA Collection System		

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see Inspection Letter

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 5-30-08
Name and Signature of Reviewer(s) Martyn G. Burt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 6/2/08

