



Environmental
Protection Agency

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

June 30, 2011

RE: ALERIS SPECIALTY PRODUCTS INC .
3GR00615*DG
STORMWATER
LORAIN

Mr. Thomas Fries
Plant Manager
Aleris Specialty Products, Inc.
320 Huron Street
Elyria, OH 44035

Dear Mr. Fries:

On June 23, 2011 this writer conducted an inspection of your facility, located at 320 Huron Street, Elyria, Ohio, to determine compliance with the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activities #OHR000004 referenced above. Along with my observations from the inspection I have provided comments concerning your permit below:

General:

1. This site is the location of Aleris Specialty Products, Inc., a recycling facility which specializes in aluminum shredding and sizing.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. I was told that storm water collected in the east end of Building 1 is typically pumped and released outside. It is imperative that this water is examined before it is released for any signs of contamination. If the water is pure storm water, it may be released; however, if it is not, it must be collected and hauled off site to be disposed of properly.
2. At the time of inspection it had just rained. It appeared that aluminum chips/turnings from the west side of Building 1 had been carried all over the property in this event. Although the area is swept around 2:00 p.m. every day, monthly inspection records indicated that the screens in the parking lot area are often in need of replacement which may be another sign that more attention should be given to the containment of these particles. Currently a wall is in place to the east of the area where the chips are dropped off. Although, it is preferred that this matter be dropped off in an enclosed area to prevent the spread of material, additional containment methods, such as a berm, should be implemented along with a more frequent sweeping schedule should enclosing them not be an option.

Permit:

1. As required in paragraph D.3.g.1 of part IV of the permit, the Non-Storm Water Discharges certification should include:

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- a. The identification of potential significant sources of non-storm water at the site.
 - b. A description of the results of any test and/or evaluation (this does not necessarily require discharge sampling) for the presence of non-storm water discharges.
 - c. The evaluation criteria or testing method used and the date of any testing and/or evaluation.
 - d. The on-site drainage points that were directly observed during the test.
2. At the time of inspection, records of Comprehensive Site Compliance Evaluations, required in paragraph D.4 of paragraph IV of the permit, could not be produced. A copy of the results of these evaluations should be kept with the Storm Water Pollution Prevention Plan (SWPPP).
 3. The map of the facility should include the following:
 - a. Arrows indicating sheet flow on the property.
 - b. Identification of local streams, lakes, ditches, waterways, etc.
 - c. The direction of flow for all stormsewers.

Action Items

- Adopt the practice of examining water from the east side of the building before it is released.
- Look into and implement another method of containment for the aluminum chips to keep them from spreading across the site.
- Make aforementioned improvements to SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than July 13, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email at kelly.mcvay@epa.ohio.gov.

Sincerely,



Kelly A. McVay
Assistant to the District Engineer
Division of Surface Water

KAM/mt

cc: Jason Bring, Production Superintendent, Aleris Specialty. Prod. Co.
Mukund Moghe, Engineer and Storm Water Program Coordinator, City of Elyria
Terry Korzan, Superintendent, City of Elyria Wastewater Treatment Plant