



Environmental
Protection Agency

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

June 23, 2011

RE: CLIFTON STEEL CO
3GR01205*DG
STORMWATER
CUYAHOGA

Mr. William Bernay
Plant Manager
Clifton Steel Company
16500 Rockside Road
Maple Heights, OH 44137

Dear Mr. Bernay:

On June 20, 2011 this writer conducted an inspection of your facility, located at 16500 Rockside Road, Maple Heights, Ohio to determine compliance with your Industrial General Storm Water NPDES permit 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 Clifton Steel Company, a company which provides innovative solutions to the abrasion resistant steel, impact resistant steel and wear resistant steel markets.
2. Most of the storm water on site empties into a swale on the south side of the building. This swale was recently dredged and I was told that grass would be planted in the area soon.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. Through the middle of the building two trench drains ran north to south in the truck run area. These storm drains are mainly used to collect melted snow off of the trucks in the winter and to collect storm water which runs in through the south door. Although it is suggested that these floor drains be capped, drip pans under the trucks which park in this area and good housekeeping methods should be used to frequently ensure that only pure water is entering the system should they be left operational.
2. Inside the building a slag dumpster was located between the trench drains. Liquid on the ground indicated that some leachate from the dumpster was probably entering the storm drain system (Figure 1). This dumpster should be lined and moved further from the storm drains to prevent any contamination.

Dumpsters should be checked upon delivery to ensure they are in decent condition and do not have any visible holes. Once again, it is suggested that the drains be capped to alleviate this issue.

3. An oil water separator in the building was in need of maintenance. A small bucket was used to collect the clean water. At the time of inspection this water was overflowing. The oil water separator should be directly connected to the storm sewer line to prevent overflow and contamination. This separator system should be checked regularly for effectiveness as well.
4. Two totes containing oil mixtures were located just outside of the south door. These totes should be properly labeled and kept indoors.
5. Dust and particulate matter was scattered on the pavement around the bag house (Figure 2). This area should be swept and inspected regularly and methods of containment should be considered to prevent this debris from washing into the storm drainage system.
6. On the south side of the property there was an outdoor storage area with an assortment of pieces and parts. The ground showed signs of oil staining and some trash debris had collected in the area (Figure 3). The stained area should be cleaned up immediately. Debris and any rusting or oily parts should be cleaned up and relocated indoors.

Permit:

1. As required in paragraph A.2 of Part IV of the permit, a Storm Water Pollution Prevention Plan (SWPPP or SWP3) was to be created within 6 months of the Notice of Intent (NOI) application. An SWPPP still must be created for this site. The following link to the USEPA website provides guidance on preparing an SWPPP along with a sample template:

http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp

2. The plan should contain a site map that shows the full site including contours of the site, direction of flow for storm water, the location of outflows, location of possible contaminations to storm water, location of all surface water bodies, and any best management practices (BMPs) that are currently in place.
3. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.

Action Items

- Consider capping indoor trench drains.

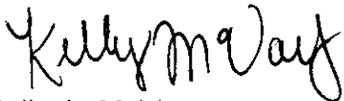
Mr. William Bernay
Clifton Steel Company
June 23, 2011
Page 3

- Adopt the practice of using drip pans under trucks parked indoors over the drains.
- Line slag dumpster to prevent leakage and move it further from drains.
- Update oil water separator system so that it is connected to the storm system directly.
- Move oil totes indoors.
- Clean bag house area and include a routine maintenance schedule in the SWPPP.
- Clean up outdoor storage area on the south side of the building.
- Create an 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 8, 2011. A copy of your newly created SWPPP should be sent to this office no later than August 12, 2011 for review.

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



Figure 1: Leachate from slag dumpster heading towards storm trench drain.



Figure 2a: Particulate matter around bag house.

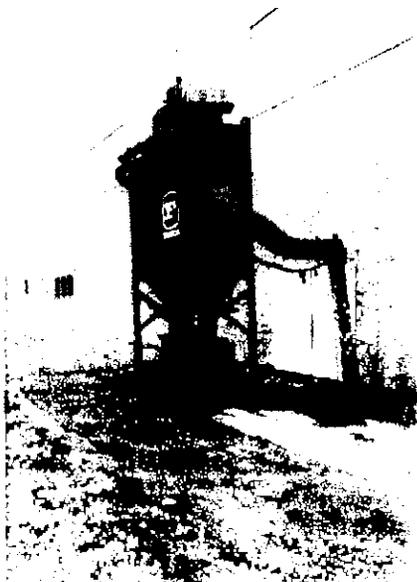


Figure 2b: Bag house cement showing significant particulate buildup and staining.



Figure 3: Staining and debris on the south side of the facility.