



**Environmental
Protection Agency**

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

March 16, 2011

RE: MAHONING COUNTY
CORONADO STEEL
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR01317*DG
INDUSTRIAL STORM WATER INSPECTION

Mr. Michael Phillips
Coronado Steel
2360 Funston Drive
Youngstown, Ohio 44510

Dear Mr. Phillips:

On March 2, 2011, Ohio EPA conducted a storm water inspection at Coronado Steel, located at 2360 Funston Drive, City of Youngstown, Mahoning County (facility). The facility was represented by Lawrence Diamond, Facilities Manager. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01317*DG.

Storm Water Inspection

Significant improvements have occurred regarding the implementation of best management practices (BMP) at the facility; however, the inspection documented the following violations of the General Storm Water Permit that must be addressed:

- Section 2.3 of the facility's storm water pollution prevention plan (SWP3) states that "only one drainage point was noted at the north end of the building near the metal storage and mold closing area." In addition, "enhanced housekeeping procedures were enacted to ensure that dust, sand and metal particles do not enter this drain." The inspection documented sediment located within the storm sewer inlet that must be removed and properly disposed.
- Section 3.2 of the facility's SWP3 states that "enhanced housekeeping measures have been implemented especially in the sweeping of the shakeout area which we recognize as a source of material that can enter drainage flows." Additional BMPs must be implemented to minimize or eliminate the discharge of potential pollutants to "surface waters of the State" (Figure 1). Ohio EPA recommends the following BMPs that can be utilized to address the pollutants associated with the shakeout area that continue to be exposed to precipitation events:
 1. Increase the sweeping frequencies to include prior to the occurrence of precipitation events;
 2. Installing berms around the shakeout area to pond runoff to prevent the discharge of pollutants; or

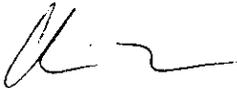
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3. Utilizing a permanent or temporary roof or other cover to prevent precipitation events from contacting the shakeout area.
- Section 3.1 of the SWP3 states that tarping of dumpsters are to be utilized. Waste sand is currently disposed of in roll-off containers. Unfortunately, the roll-off containers have holes and are not covered to prevent precipitation from contacting the spent sand (Figures 2 to 3). The roll-off containers must be covered to minimize or eliminate the potential discharge of pollutants to "surface waters of the State." The SWP3 must be implemented completely, and the roll-off containers must be tarped;
 - Section 5 of the SWP3 states the entire facility will be routinely inspected by personal examination and/or as reported by employees. In addition, quarterly visual assessments will be performed by the entire facility on the first day of the month. The inspections of the facility are not being recorded. Part IV.D.3.d and Part IV.D.3.e of the General Storm Water Permit require the facility inspections to be recorded and maintained.
 - Please be aware that annual monitoring of storm water must be performed in accordance with Part V.B.2 of the General Storm Water Permit. According to the Section 1.4 of the SWP3, the facility's standard industrial classification is 3325, Steel Foundries. The facility is required to perform monitoring for the following parameters:

Parameter	Reporting Unit	Parameter	Reporting Unit
Oil and Grease	mg/l	5-day Biochemical Oxygen Demand	mg/l
Chemical Oxygen Demand	mg/l	Total Suspended Solids	mg/l
pH	S.U.	Duration of Storm Event	Hours
Precipitation	Inches	Duration Between Storm Events	Hours
Volume (est)	Gallons	Lead, Total	ug/l
Cadmium, Total	ug/l	Copper, Total	ug/l
Arsenic, Total	ug/l	Chromium, Total	ug/l

Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt



Figure 1 - Additional BMPs must be implemented to minimize or eliminate the discharge of potential pollutants to "surface waters of the State" from the shakeout area.



Figure 2 - The roll-off containers have holes and are not covered to prevent precipitation from contacting the spent sand.



Figure 3 - The roll-off containers have holes and are not covered to prevent precipitation from contacting the spent sand.