



Environmental
Protection Agency

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

June 30, 2011

RE: ELYRIA YARD
3GR00828*DG
STORMWATER
LORAIN

Mr. Jim Vargo
PCS Metals – Elyria, LLC
5875 Landerbrook Dr., Ste 200
Mayfield Heights, OH 44124

Dear Mr. Vargo:

On June 27, 2011 this writer conducted an inspection of your facility, located at 800 Infirmary Road, Elyria, 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 Elyria Yard, a scrap metal recycling facility.
2. Drainage on the north side of the property goes to catch basins along the road which go to city storm sewers.
3. Drainage on the south side of the property goes to an unnamed tributary to Black River.
4. Liquids are typically drained from any cars received within a day or so.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. Totes containing the car liquids were left outside near the lift. These totes should be stored indoors or within secondary containment of a dike or tray, or on a bermed pad.
2. A dumpster containing engine parts and a dumpster containing steel turnings were both outside and uncovered. These dumpsters should be covered by a lid or tarp to prevent the collection of storm water and formation of leachates.
3. I was told that the northern corner of land was recently acquired. This area needs attention as it had significant oil staining and engines sitting on the ground (Figure 1). Oil stained earth should be excavated and disposed of properly. There are also biological agents which can be used to remediate oil-stained soils. Engines should be stored indoors, or on a containment device such as a tray or bermed pad.

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4. At the time of inspection a flat containing two layers of batteries was sitting outside of the entrance garage. I was told these batteries were moved indoors at night. It is preferred that batteries be stored indoors at all times.

Permit:

1. The facility map in the Storm Water Pollution Prevention Plan (SWPPP) should include labels identifying:
 - a. The location of potential sources of pollutants and material storage areas.
 - b. Catch basins and the storm sewer lines they are connected to.
2. The Non-Storm Water Discharges Certification must be signed by the appropriate individual(s).
3. As required in paragraph D.4 of part IV of the permit, Comprehensive Site Compliance Evaluations must be conducted annually and results of these evaluations must be kept with the plan for review.

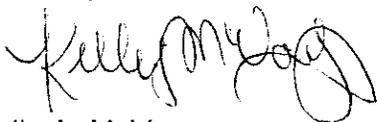
Action Items

- Provide secondary containment for car fluids totes or move them indoors.
- Cover steel turnings and engine dumpster.
- Clean up oil stains and move engines in newly acquired area.
- Make aforementioned changes 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 15, 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: Rick Leikin, Yard Manager, Elyria Yard
Mukund Moghe, Engineer and Storm Water Program Coordinator, City of Elyria
Terry Korzan, Superintendent, City of Elyria Wastewater Treatment Plant



Figure 1: Newly acquired area containing oil stains and engines on the ground.