



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

June 8, 2009

RE: RTI ALLOYS TPD
OHR000004
STORMWATER
STARK COUNTY

Ms. Kathleen Nevitt
Environmental, Health & Safety Coordinator
RTI Alloys
208 15th St SW
Canton, Ohio 44707

Dear Mrs. Nevitt:

On June 3, 2009 this writer conducted an inspection of your facility to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Besides yourself, David Rischar, Ohio EPA Intern was present during the inspection. We have also reviewed your Storm Water Pollution Prevention Plan (SWPPP). Along with our observations we have provided comments concerning the SWPPP below:

Inspection

- 1) The hopper located in the chip loading area is not weather proof. Storm water coming into contact with the turnings or chips drain out of the side and onto the ground. Direction of flow is to the north and over the side of the embankment. Should contaminants be present in the hopper they would not be contained. The hopper should either be leak-tight or stored under roof. If the turnings or chips do not contain any cutting oils or lubricants, the storm water could be directed to the interior drains which flow to your storm water pond.
- 2) The storm water pond to which runoff from your facility is directed is not providing any storm water retention. At the time of our inspection it was raining and flow was entering the basin. Flow travelled straight from the inlets to the outlet. No appreciable retention was achieved. In reviewing the sediment and erosion control plan contained in the SWPPP, it appears that the current outlet structure was not installed as designed. The concrete wall baffle separating the two halves of the detention outlet was supposed to contain a 2" orifice to allow water to drain slowly, backing up the water level in the pond. The water would eventually overflow and would exit the 18" outlet through a 12" orifice. As designed, storm water would back up into the pond providing detention time to settle out solids before discharging to waters of the state of Ohio. The detention outlet must be reconstructed as designed.



Ms. Kathleen Nevitt
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June 9, 2009
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SWPPP review

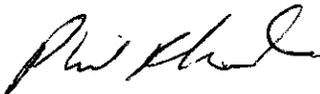
- 1) The plan should contain specific storm water annual training dates and verification that the training was conducted.
- 2) The SWPPP must contain a certification that the storm sewer system has been tested for non-storm water discharges. Since your facility does not generate process or non-process wastewaters discharging to the storm sewers, a dry weather observation must be conducted. The following Web link to US EPA providing guidance on SWPPP contains an example of a certification page which you may use:

<http://cfpub.epa.gov/npdes/home.cfm?programid=6>

- 3) Annual sampling is required at your facility. You indicated that sampling has been done on the two inlets to the storm water basin. Please be aware that your permit requires sampling be done annually on the discharge from the basin. State whether or not there are any interior floor drains in any buildings on the property which are connected to storm water drains.
- 4) All records of monitoring info, copies of reports, sampling data, etc..., must be kept for at least 6 years from the date of origination as required in Part VI, C of the permit. These records should be kept with the SWPPP.

Please resubmit the updated SWPPP with the above listed items adequately addressed within 30 days of the receipt of this letter as required by the General permit. If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1128.

Sincerely,



Philip P. Rhodes P.E.
Environmental Specialist II
Division of Surface Water

PPR/mt

File: Stormwater