



Environmental
Protection Agency

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

February 2, 2011

RE: TRUMBULL COUNTY
ULTRA PREMIUM OILFIELD SERVICES, LTD
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR01296*DG

CERTIFIED MAIL

Mr. Ernie Sexton, Plant Manager
TMK - IPSCO
ULTRA Premium Oilfield Services, Ltd.
6880 Parkway Drive
Brookfield, Ohio 44430

Dear Mr. Sexton:

On December 24, 2010, Ohio EPA's Division of Surface Water (DSW) received a complaint alleging that coolant from metal cutting operations is leaking from the bottom of the roll-off container into a storm drain located in a service bay. Also an oily sludge is disposed of within chip hoppers which are then placed into the roll-off container in a service bay, located at ULTRA Premium Oilfield Services, Ltd, 6880 Parkway Drive, Brookfield Township, Trumbull County (facility).

On January 3, 2011, Ohio EPA's Division of Surface Water (DSW) inspected the facility. During the inspection I was accompanied by Tomas Parry. The facility was represented by David Shrontz, Human Resources and Safety, and you. According to Mr. Shrontz, the facility's industrial activities are categorized by Standard Industrial Classification (SIC) Code 3498, Fabricated Pipe and Pipe Fittings, and is authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01296*DG.

The inspection documented the following:

- The facility employs approximately fifty-three employees. On November 15, 2010, employees were trained on the facility's storm water pollution prevention plan (SWP3);
- Mr. Shrontz stated that waste oil is not being generated as lubricating oil is currently being recycled. Full production commenced in May 2010 and two fifty-five gallon drums of waste oil were disposed of previously. Waste coolant generation began at the facility in March 2010. The facility currently has three fifty-five gallon drums of waste coolant awaiting disposal. The facility utilizes Safety-Kleen for waste oil and coolant disposal operations;

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- A draft SWP3, dated August 2010, has been developed by ENVIRON International Corporation for the facility. A copy of the draft SWP3 was provided to Ohio EPA. The draft SWP3 must be finalized and be reflective of current operations;
- Section 8.0 of the SWP3 details that all containers are to be covered/closed when not in use. The solid waste dumpster located outdoors was not covered at the time of the inspection (Figure 1). Covering the solid waste dumpster or relocating under the facility's roof are two options to minimize or prevent the discharge of pollutants to "waters of the state." Via a January 7, 2011 e-mail, Mr. Shrontz detailed that one eight yard flip top dumpster with a sliding door has been obtained;
- Section 10.1 of the SWP3 states that the annual comprehensive site compliance evaluation (ACSCE) is to be conducted by the plant manager. Currently, the ACSCE is being performed by Mr. Shrontz and Evelyn Majoris, Environmental Manager. The SWP3 must be revised to reflect current operations. A copy of the 2010 ACSCE was unavailable for review. Mr. Shrontz stated that the 2010 ACSCE was not performed in December due to the holiday schedule. The facility must perform ACSCE's in accordance with Part IV.D.4 of the General Storm Water Permit;
- Section 12.4 of the SWP3 states that absorbent pads and materials are to be utilized for oil leaks from scrap metals. Scrap metal roll-off containers are stored in the service bays which have floor drains installed. Sorbent booms are utilized to prevent the discharge of pollutants to the floor drains (Figures 2 to 3). If the floor drains are connected to a storm sewer system, then they must be permanently capped to prevent the discharge of pollutants to "waters of the state." If the floor drains are connected to a sanitary sewer system, an oil/water separator may be required to be installed. Please contact the local pretreatment program coordinator serving the area for additional information; and
- Soil is being eroded in the roadways serving the outdoor storage area. Redressing the exposed soil with gravel or modifying the catch basins serving this area to remove sediment prior to a discharge to "waters of the state" are corrective action options. Numerous commercially available products can be installed around or within the catch basin to remove sediment prior to a discharge to "waters of the state."

During the inspection, Mr. Shrontz stated that the facility may expand in the near future. Please be aware that additional permitting may be required for the following:

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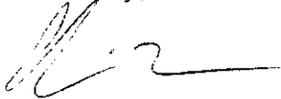
- If the future construction project will result in the soil disturbance of one or more acres of land, then a General Storm Water Permit for Construction Activities must be obtained via submitting a Notice of Intent (NOI) and appropriate review fee. An SWP3 must be developed by the time the NOI is submitted to Ohio EPA. For your convenience, the NOI can be obtained from the following Web site:

<http://www.epa.ohio.gov/dsw/storm/stormform.aspx>

- If streams or wetlands are to be impacted 404/401 permits may be required and can be obtained from the U.S. Army Corps of Engineers and Ohio EPA's 401 Section. Please contact Ed Wilk, Ohio EPA 401 Coordinator, at (330) 963-1172 for additional information regarding 404/401 permitting.

A copy of the facility's final SWP3 must be submitted to Ohio EPA. Within thirty-days of receiving this letter of deficiency, please submit a written correspondence detailing what corrective actions will be implemented. The written correspondence must also include a schedule for implementation. 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

ec: Tomas Parry, Ohio EPA, DSW, NEDO



Figure 1 - The solid waste dumpster located outdoors was not covered.

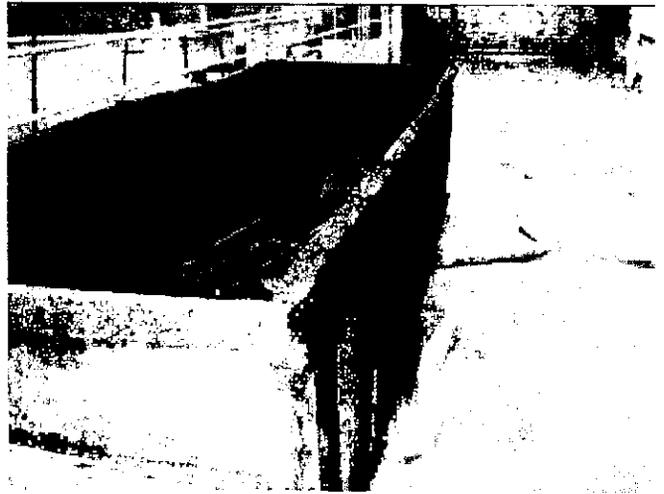


Figure 2 - Sorbent booms are utilized to prevent the discharge of pollutants to the floor drains.



Figure 3 - Sorbent booms are utilized to prevent the discharge of pollutants to the floor drains.

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 ERNIE SEXTION, PLANT MANAGER
 TMK - IPSCO
 ULTRA PREMIUM OILFIELD SERVICES
 6880 PARKWAY DRIVE
 BROOKFIELD, OH 44430

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
[Signature]

B. Received by (Printed Name) *David Shrontz*

C. Date of Delivery *2/5*

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 If YES, enter delivery address below:

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 Insured Mail C.O.D.

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