



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 17, 2008

RE: PTC ALLIANCE  
3ID00043  
STARK COUNTY

Mr. Robert Teter  
Environmental Engineer  
PTC Alliance  
640 Keystone Street  
Alliance, OH 44601

Dear Mr. Teter:

On November 13, 2008, this writer conducted a compliance evaluation inspection of your facility. Besides yourself, in attendance was Matt Caprarese, PTC Alliance, Corporate Environmental Manager. At the time of the inspection, the plant wastewater treatment system treating process wastewater from the mill was in good operating condition and producing a clear effluent at the observation trough located inside the building. Noted was that the effluent was slightly foaming. You indicated that the foam dissipates rapidly and is not present at outfall 002. As we discussed, this office has no objections to you conducting the sampling at this observation trough instead of the storm sewer located outside the building. It will not require any modification of your NPDES permit as this location represents the final discharge from outfall 602 before mixing with any other waters.

We talked about outfall 003, which is supposed to contain non-contact cooling water only. Below is a summary of the values you have been reporting for Zinc since January 2006:

Parameter	Units	Date	Reported Value
Zinc, Total Recoverable	ug/l	2/1/2006	280
Zinc, Total Recoverable	ug/l	3/1/2006	690
Zinc, Total Recoverable	ug/l	4/4/2006	130
Zinc, Total Recoverable	ug/l	5/1/2006	460
Zinc, Total Recoverable	ug/l	6/1/2006	250
Zinc, Total Recoverable	ug/l	7/5/2006	320
Zinc, Total Recoverable	ug/l	8/1/2006	280
Zinc, Total Recoverable	ug/l	9/5/2006	300
Zinc, Total Recoverable	ug/l	10/2/2006	300
Zinc, Total Recoverable	ug/l	11/1/2006	330
Zinc, Total Recoverable	ug/l	12/1/2006	350
Zinc, Total Recoverable	ug/l	1/2/2007	280
Zinc, Total Recoverable	ug/l	2/1/2007	240
Zinc, Total Recoverable	ug/l	3/2/2007	710
Zinc, Total Recoverable	ug/l	4/2/2007	590
Zinc, Total Recoverable	ug/l	5/1/2007	570
Zinc, Total Recoverable	ug/l	6/1/2007	550

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Parameter	Units	Date	Reported Value
Zinc, Total Recoverable	ug/l	6/1/2007	550
Zinc, Total Recoverable	ug/l	7/2/2007	450
Zinc, Total Recoverable	ug/l	8/1/2007	300
Zinc, Total Recoverable	ug/l	9/5/2007	380
Zinc, Total Recoverable	ug/l	10/1/2007	330
Zinc, Total Recoverable	ug/l	11/1/2007	340
Zinc, Total Recoverable	ug/l	12/3/2007	550
Zinc, Total Recoverable	ug/l	1/2/2008	680
Zinc, Total Recoverable	ug/l	2/4/2008	510
Zinc, Total Recoverable	ug/l	3/3/2008	550
Zinc, Total Recoverable	ug/l	4/1/2008	170
Zinc, Total Recoverable	ug/l	5/1/2008	660
Zinc, Total Recoverable	ug/l	6/2/2008	460
Zinc, Total Recoverable	ug/l	7/1/2008	390
Zinc, Total Recoverable	ug/l	8/1/2008	570
Zinc, Total Recoverable	ug/l	9/2/2008	250
Zinc, Total Recoverable	ug/l	10/1/2008	240

The reason given for these high values is that the cooling water is open to ambient air and may be contaminated by fugitive dust containing Zinc. These values are high and minimally will be addressed during the next NPDES permit renewal. Ryan's Run is considered a Zero low flow stream, therefore the limit for outfall 002 could theoretically be applied to outfall 003 upon permit renewal. You indicated that 003 could be eliminated by connection to the City of Alliance sanitary sewers as the flow averages approximately 4,000 gpd. We suggest that you contact the City of Alliance to explore this option.

We discussed a couple of issues regarding storm water and your Storm Water Pollution Prevention Plan (SWPPP). Roll off boxes stored outside and containing waste material must not be allowed to contaminate storm water. Acceptable practices are: Leak proof containers, water proof covers, storage under roof, and/or storage over concrete pad with collected water tied into appropriate treatment. Two roll off boxes in the vicinity of the flow equalization basin were observed to be containing waste materials where none of the aforementioned controls were applied. This should be addressed in your SWPPP plan. An updated copy will be ready by the end of November 2008. Please forward a copy of this plan to this office upon completion.

You expressed interest in obtaining water quality information for Ryan's Run. The contact here at our office is Greg Orr, DSW, NEDO. He can be reached at (330) 963-1189 or by e-mail at [greg.orr@epa.state.oh.us](mailto:greg.orr@epa.state.oh.us).

A review of your compliance history as identified by our SWIMS tracking system for the time period of August 2006 through July 2008 revealed the following violations of your National Pollutant Discharge Elimination System (NPDES) permit:

### Numeric Violations

Station	Reporting	Parameter	Limit		Reported	Violation
	Code		Type	Limit	Value	Date
002	00515	Residue, Total Dissolv	1D Qty	2736	3179.4	1/16/2006
002	01094	Zinc, Total Recoverabl	1D Conc	330	570.	3/22/2006
002	00719	Cyanide, Free	1D Conc	0.046	.07	7/17/2006
002	01094	Zinc, Total Recoverabl	1D Conc	330	1700.	7/24/2006
002	01094	Zinc, Total Recoverabl	1D Qty	0.30	.67562	7/24/2006
002	00719	Cyanide, Free	1D Conc	0.046	.06	9/11/2006
002	01094	Zinc, Total Recoverabl	1D Conc	330	400.	11/13/2006
002	00400	pH	1D Conc	6.5	6.27	1/2/2007
002	01094	Zinc, Total Recoverabl	1D Conc	330	370.	1/8/2007
002	01094	Zinc, Total Recoverabl	1D Conc	330	450.	3/15/2007
002	01094	Zinc, Total Recoverabl	1D Conc	330	510.	10/12/2007
002	01094	Zinc, Total Recoverabl	1D Conc	330	380.	10/17/2007
002	01094	Zinc, Total Recoverabl	1D Conc	330	460.	12/27/2007
002	00400	pH	1D Conc	6.5	6.38	1/15/2008
001	00552	Oil and Grease, Hexane	1D Conc	10	59.	2/5/2008
002	00552	Oil and Grease, Hexane	1D Conc	10	23.	5/1/2008
001	00400	pH	1D Conc	6.5	6.44	7/1/2008
001	00552	Oil and Grease, Hexane	1D Conc	10	14.	7/1/2008
602	01094	Zinc, Total Recoverabl	30D Qty	0.15	.18255	7/1/2008
002	01094	Zinc, Total Recoverabl	1D Conc	330	340.	9/8/2008

### Frequency Violations

None for the reporting period.

I hope this is an accurate account of the inspection. If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, PE  
Environmental Engineer  
Division of Surface Water

PPR/mt

File: Industrial/ Permit compliance