



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

December 18, 2007

RE: NATIONAL BRONZE & METALS, INC.
PERMIT NO. 3IN00316
LORAIN COUNTY

Mr. João C. F. Saraiva
General Manager
National Bronze & Metals, Inc.
5311 West River Road North
Lorain, Ohio 44055

Dear Mr. Saraiva:

On November 20, 2007, an inspection of the above referenced facility was conducted. The facility was represented by you. The purpose of the inspection was to evaluate the facility's stormwater management house keeping operations along the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection the following items were noted/discussed:

1. **Effluent concentrations for copper total recoverable, lead total recoverable, and zinc total recoverable are being reported at elevations which exceed water quality based effluent limits. National Bronze & Metals Inc. needs to look at ways to reduce these concentration levels.**
2. Raw materials are still being stored outdoors.
3. You informed me that the facility will be adding additional capacity with no change in the process. The new foundry is proposed to be in operation by April 2009. You stated that the facility's intentions are to have a totally contained production facility. All raw and finished materials will be stored under roof. It is anticipated that the elevated metal concentrations will be drastically reduced following the completion of the expansion.
4. The existing operation will begin to transition to the new operation as early as 4-5 months.
5. The old plant is proposed to be mothballed and used for consumable storage.
6. The facility currently employs 40 employees. The number of employees is proposed to increase to 72.
7. The sanitary and facility showers are tied into the City of Lorain Wastewater Treatment Plant.
8. The facility is going to be undergoing a change in ownership. This will require a permit transfer application form to be submitted.
9. You also indicated that outfall 3IN00316001 was going to be relocated. This will require a permit modification request form to be submitted.
10. The facility's permit is scheduled to expire on August 31, 2008. Based on the elevated metal concentrations noted in comment 1, water quality based effluent limits may be required in the next permit.

This office has recently reviewed your self-monitoring reports covering the period September 1, 2006 thru November 30, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

RECEIVED
DEC 19 2007

BY:



Ohio EPA is an Equal Opportunity Employer

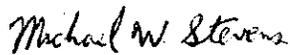
Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.	10/17/2006
001	00400	pH	1D Conc	6.5	4.5	11/16/2006
001	00400	pH	1D Conc	6.5	2.	1/5/2007
001	00400	pH	1D Conc	6.5	5.	2/26/2007
001	00400	pH	1D Conc	6.5	6.4	3/22/2007
001	00400	pH	1D Conc	6.5	4.5	6/1/2007
001	00400	pH	1D Conc	6.5	4.6	7/19/2007
001	00400	pH	1D Conc	6.5	4.6	8/7/2007
001	00400	pH	1D Conc	6.5	4.5	10/23/2007
001	00400	pH	1D Conc	6.5	4.6	11/15/2007

No frequency violations were noted.

Should you have any comments or questions concerning this letter, please feel free to call me at 330-963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of surface Water

MWS:bo