



**Environmental
Protection Agency**

John Kasich, Governor
Lee Fisher, Lt. Governor
Chris Kosloski, Director

July 29, 2010

RE: RESERVE ALLOYS
3II00194*AD
SUMMIT COUNTY

Mr. Dennis Stropko
Commercial Alloys
1831 East Highland Road
Twinsburg, Ohio 44087

Dear Mr. Stropko:

On July 28, 2010 this writer conducted an inspection of your facility for the purpose of gathering information necessary to renew the above referenced NPDES permit. You accompanied me during the visit. Below you will find a summary of the inspection:

Inspection Observations:

- 1) Reserve Alloys has expanded the types of recyclable materials to include brass, copper and stainless steel. This is a change from the previous owner, Commercial Alloys, to which the original permit was issued. Commercial Alloys primarily received only aluminum based material. This change should have been reflected in the 2C Application for the renewal permit. Depending upon the analytical results in the 2C, additional parameters may be added to your NPDES permit.
- 2) Two piles of "frag" were observed near the outside unloading area at the southwest corner of the building. This is a ground material that is much finer than typical scrap. It was located a few feet from an open storm drain that leads to the storm sewers on the south side of the building. Eventually, these storm drains connect to your pond and oil water separator. This material being readily erodible should not be stored for processing anywhere near an open storm sewer. It should be received inside the building and not exposed to stormwater.
- 3) At the same location mentioned above, an open truck with the gate down contained what you described as "twitch". Reportedly, this is a blend of aluminum, brass, copper, and maybe stainless steel. This material is a very fine almost sand like substance. This truck should have a water tight cover and the rear gate in place to prevent stormwater from contacting the material and entering the storm sewer.
- 4) A temporary plastic fabric type shelter has been placed on the west side of the building. It is a storage site for maintenance activity. Several drums and totes of different types of oils were observed inside this structure. There was no containment provided for these materials should an accidental spill occur. They should be located within some type of containment such as large pans, or behind

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a dike capable of containing a spill or leak. An open storm drain for the storm sewers is approximately 100 feet or less away.

- 5) Batteries on a pallet were seen outside the northwest corner of the building. Upon pointing this out you immediately had an employee remove them and place them inside. Batteries should never be stored outside and exposed to stormwater.
- 6) The area on the northwest part of the property is still being cleaned up. The tires have been removed. The top layer of material is being processed for its aluminum content. The area is expected to be finished and re-graded shortly.
- 7) The salt pile has been removed. You stated that salt will not be stored outside again.
- 8) The area under the baghouses has been improved. The dust that was observed during our last inspection was minimal.

A review of your compliance history as determined by our SWIMS compliance tracking system for the time period of May 2009 through June 2010 revealed the following violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00552	Oil and Grease, Hexane	1D Conc	10	19.	12/9/2009
001	00400	pH	1D Conc	9.0	9.2	3/4/2010

You are requested to update your 2C Application to include in the analytical section in Part V, any metals that you now handle as a recyclable material and could be present in your stormwater discharge. This must be done as soon as possible as the permit is to be renewed soon.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136 or by e-mail phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes
Environmental Specialist II
Division of Surface Water

PPR/mt

File: Industrial Permit/Compliance