Ohio | Environmental Protection Agency

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

May 25, 2011

RE: REPUBLIC SPECIAL METALS INC.
3ID00001*ED
STARK COUNTY

Mr. Paul Schmucker
Plant Manager
Republic Special Metals, Inc.
2201 Harrison Avenue SW
Canton, Ohio 44706

Dear Mr. Schmucker:

On May 17, 2011 this writer conducted an inspection of your facility for the purpose of determining compliance with the above referenced NPDES permit. You accompanied me during the visit. Below you will find a summary of the inspection.

Plant Overview

Republic Special Metals (RSM) produces high quality alloy steels for end users such as the aircraft industry. Steel ingots are not produced on-site. They are brought in from various steel mills and re-melted in the #1 Melt Shop. Here the ingots are welded to a consumable electrode lowered vertically into one of six vacuum melt furnaces. The steel is slowly melted, anywhere from 15 to 55 hours. The melt drips and falls by gravity into a desired mold. The purpose of re-melting the steel is to create steel that is homogenous and denser than the original ingot and remove impurities. Noncontact cooling water is used to cool the furnace. Here at the melt shop a treatment system used to treat PCB's is still in place which is treating PCB contaminated groundwater collected in the basement.

In the G&B Grinder Building, the ingots are ground to remove scale. Waste produced here is swarf which consists of grinder wheel material and scale. The swarf is collected and stored in roll off boxes within the building. The swarf is then sent to a recycler. There is no exposure to storm water. A baghouse collects dust from this building. The baghouse is located outside the building where dust is collected in "supersacs". At the time of the inspection there were no visual problems with this area as the dust was properly contained.

In the Forge shop, steel ingots are furnace heated and reduced to a desired thickness by a hydraulic press. This is considered annealing. Noncontact cooling water is used to cool the furnaces and the hydraulic press.

In the Finishing building steel is cut and planed to customer specifications. The steel is also ultrasonically tested. Planing aids in the ability to test the steel. The saw is lubricated with a water based lube which is recycled with no discharge. Steel cuttings from the saw are reportedly collected, drained and taken to the G&B Grinder Building and disposed with the swarf in the roll off boxes. Drained cutting oil is hauled out by North Canton Drain. The shavings from the planing of steel are dry and disposed in a roll off box located on a concrete pad outside the building. At the time of the inspection there were steel cuttings also present in this box along

with an appreciable amount of cutting oil. The box is not water tight and when it is picked up the oil will drain out. This oil must be pumped out of the box immediately and measures taken to ensure the saw cuttings are never allowed to be handled in this manner.

Outfalls and Treatment Provided

601: Treatment of the groundwater from the melt shop basement consists of an oil/water separator, cartridge filter, and two carbon absorption units operated in series.

603: This outfall consists of noncontact cooling water from various operations. It is cooled by a cooling tower and a spry pond located up on top of the hill on the east side of the property. This outfall rarely discharges and at the time of the inspection was not flowing. At the time of the inspection a heavy accumulation of floating oil was observed on the surface of the cooling pond. It should be removed as soon as possible to prevent an unanticipated release. Picture attached.

001: Treatment consists of a concrete stilling basin equipped with an under flow baffle. This outfall receives noncontact cooling water, 601 effluent and storm water. At the time of the inspection the outfall was flowing clear and there were no obvious problems. However, it was noted that the concrete stilling basin was coated with an unknown thickness of oil. You were not sure when the last time the oil was removed. It was strongly suggested that the oil be removed as soon as possible to avoid an unanticipated discharge during a heavy rain event. A schedule should be set up to routinely evaluate the amount of oil accumulated and remove it before an accidental discharge occurs. Pictures attached.

003: Receives storm water runoff from the southeast corner of the property and is not treated.

004: Receives storm water from the northwest portion of the property and is not treated.

A review of your compliance history for the time period of July 1, 2006 through March 2011 revealed the following violation of your NPDES permit:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2008	603	00400	pH	1D Conc	9.0	9.2	6/23/2008

Stormwater

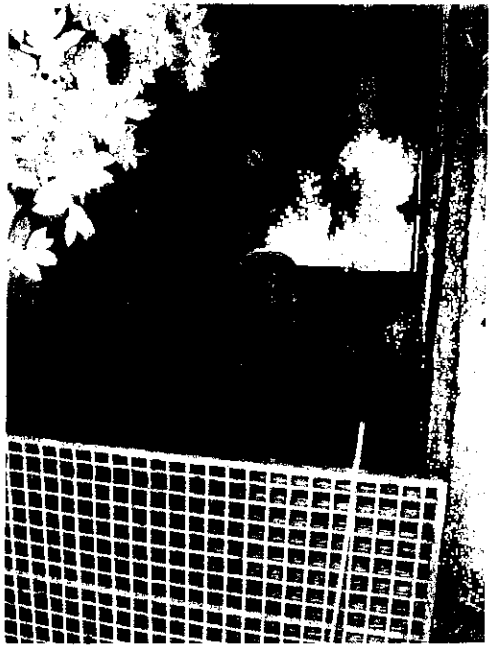
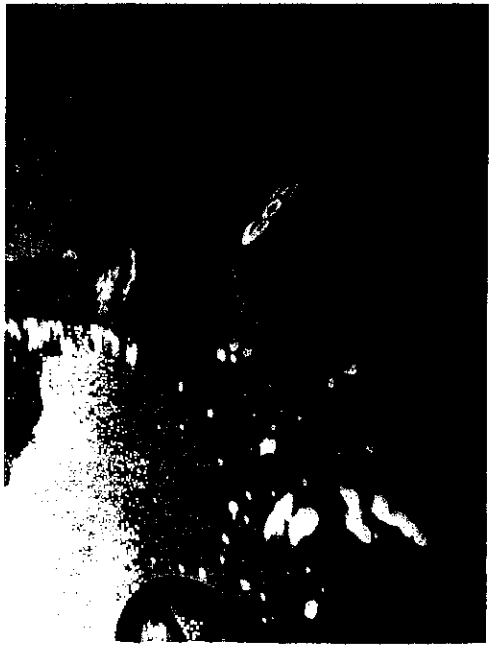
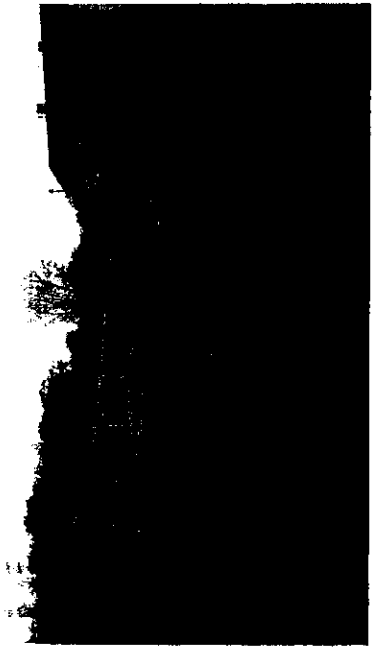
I did a cursory review of your Stormwater Pollution Prevention Plan (SWPPP) and will hold off on providing comments at this time. In general, the plan should be revisited as it was created in October 2006 and in lieu of the upcoming Multi-Sector General Stormwater Permit a few changes may need to be made. Observed during the inspection were the areas in the vicinity of the melt shop and east. Refer to the picture below. This area is used for storage of drums containing waste material. Good stormwater management practice is to house drums within a structure and provide containment for spills.

There is a salt storage area on the site that was brought to your attention. The salt is stored on bare ground and is not stored on a concrete or blacktop pad. A tarp is used to cover the salt during use. Concrete block is used as perimeter containment. A pile of uncovered salt was observed nearby. Pictures are attached for reference. Salt piles must be stored over a containment pad and under a suitable overhead structure to prevent contact with precipitation. It is our experience that tarps are inadequate. The aforementioned areas should be specifically addressed in an updated SWPPP. We request that you update the SWPPP and submit a copy to this office no later than July 25, 2011.

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

Sincerely,

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

PPR/mt

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