



Environmental
Protection Agency

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

May 19, 2011

RE: TRUMBULL COUNTY
RTI INTERNATIONAL METALS, INC.
OHIO EPA PERMIT NO. 3IC00026
NPDES PERMIT NO. OH0010863

Mr. Richard Mason, Director - Environmental Affairs
RTI International Metals, Inc.
1000 Warren Avenue
Niles, Ohio 44446

Dear Mr. Mason:

On May 11, 2011, an inspection of the above referenced facility was conducted by Mr. Erm Gomes, Mr. Dean Stoll, Ms. Lindsey Olmstead, and the undersigned, all from Ohio EPA. Mr. Chuck Prachik represented the facility. The inspection was performed to evaluate the operational performance of the treatment systems and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the facility's treatment processes, equipment, and effluent discharge quality at the respective outfalls.

At the time of the inspection, the following observations, findings, and comments were noted:

1. Pursuant to PTI #779103, the L.C.R. sanitary wastewater treatment system (NPDES #3IC00026602) was demolished, and its flows re-routed via a new pump station and force main, to the facility's main wastewater treatment plant (NPDES #3IC000266001). This work was completed in early 2011. As of the date of the inspection, the only work remaining for this project is to finish filling, compacting, and seeding the location of the old plant. An NPDES permit modification was received and processed by this office to reflect these changes made to the facility's wastewater treatment systems.
2. The quality of the effluent from the treatment pond appeared to be of visually-acceptable quality. There was no evidence of foam, oil, or floating debris being discharged to the Mahoning River from Outfall 001.
3. Please keep a bound and numbered log book on site to document plant visits made by Dwane Stull, the certified operator contracted to operate and maintain the main wastewater treatment plant. Please ensure that arrival and departure times, along with a detailed breakdown of maintenance activities performed, are recorded in the log book.

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4. Ohio EPA understands that Dwane Stull currently makes monthly visits to the wastewater treatment plant. Please note that upon renewal of the facility's NPDES permit, there will be new language requiring the certified operator to visit the plant a certain number of times per week. With an allotted sanitary flow of 37,500 gpd, the facility's wastewater plant is considered to be a class I facility. Class I plants require a certified operator to be on site at least 3 times a week for a minimum of 1.5 hours total.
5. Ohio EPA also reviewed the facility's Storm Water Pollution Prevention Plan (SWP3). Please ensure that the plan includes a title sheet that is signed in accordance with the requirements enumerated in Title 40 Code of Federal Regulations (40 CFR) 122.22.
6. Please ensure that the names and contact information of the members of the Pollution Prevention Team are provided in the SWP3.
7. Please include in the SWP3 the approximate dates that the required storm water training is offered to employees. Also, are all employees informed about the existence and requirements of the facility's SWP3 during the required training sessions?

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period September 2009 – May 2011 indicates violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance are:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2009	001	61942	pH, Minimum	1D Conc	6.5	6.3	9/26/2009
August 2010	001	61942	pH, Minimum	1D Conc	6.5	6.3	8/21/2010
January 2010	601	00530	Total Suspended Solids	1D Conc	45	46.	1/6/2010
October 2010	001	61942	pH, Minimum	1D Conc	6.5	5.27	10/15/2010
October 2010	001	61942	pH, Minimum	1D Conc	6.5	5.93	10/17/2010
October 2010	001	61942	pH, Minimum	1D Conc	6.5	6.15	10/18/2010
October 2010	001	61942	pH, Minimum	1D Conc	6.5	6.22	10/22/2010
November 2010	001	61942	pH, Minimum	1D Conc	6.5	6.36	11/19/2010
January 2010	001	01094	Zinc, Total Recoverabl	30D Qty	0.180	.19332	1/1/2010
January 2010	001	01094	Zinc, Total Recoverabl	30D Conc	95	113.	1/1/2010
October 2009	601	00530	Total Suspended Solids	30D Conc	30	32.	10/1/2009
October 2010	001	61942	pH, Minimum	1D Conc	6.5	5.38	10/16/2010
October 2010	001	61942	pH, Minimum	1D Conc	6.5	6.25	10/23/2010
November 2010	001	61942	pH, Minimum	1D Conc	6.5	6.39	11/18/2010
December 2009	001	31616	Fecal Coliform	30D Conc	1000	1100.	12/1/2009
November 2009	601	00530	Total Suspended Solids	30D Conc	30	34.	11/1/2009
December 2009	001	01094	Zinc, Total Recoverabl	30D Qty	0.180	.20848	12/1/2009
February 2011	001	01094	Zinc, Total Recoverabl	1D Conc	228	229.	2/2/2011

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Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2011	001	01094	Zinc, Total Recoverabl	30D Conc	95	229.	2/1/2011
February 2011	001	01094	Zinc, Total Recoverabl	1D Qty	0.431	.59807	2/2/2011
February 2011	001	01094	Zinc, Total Recoverabl	30D Qty	0.180	.59807	2/1/2011
October 2009	001	61942	pH, Minimum	1D Conc	6.5	6.4	10/2/2009
November 2009	001	61942	pH, Minimum	1D Conc	6.5	6.3	11/19/2009
November 2010	001	61942	pH, Minimum	1D Conc	6.5	6.42	11/20/2010
September 2009	001	61942	pH, Minimum	1D Conc	6.5	6.3	9/27/2009
November 2009	001	61942	pH, Minimum	1D Conc	6.5	6.3	11/20/2009
May 2010	001	61942	pH, Minimum	1D Conc	6.5	6.2	5/14/2010

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IC00026*CD	September 2009	001	61942	pH, Minimum			AD	9/18/2009
3IC00026*CD	September 2009	001	50050	Flow Rate			AD	9/18/2009
3IC00026*CD	September 2009	001	61942	pH, Minimum			AD	9/19/2009
3IC00026*CD	September 2009	001	50050	Flow Rate			AD	9/19/2009
3IC00026*CD	September 2009	001	61942	pH, Minimum			AD	9/20/2009
3IC00026*CD	September 2009	001	50050	Flow Rate			AD	9/20/2009
3IC00026*CD	September 2009	001	61942	pH, Minimum			AD	9/21/2009
3IC00026*CD	September 2009	001	50050	Flow Rate			AD	9/21/2009
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/8/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/9/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/10/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/11/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/12/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/13/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/13/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/14/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/14/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/15/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/15/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/16/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/16/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/17/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/17/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/18/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/18/2010
3IC00026*CD	July 2010	001	50050	Flow Rate			AD	7/19/2010
3IC00026*CD	July 2010	001	61942	pH, Minimum			AD	7/19/2010
3IC00026*CD	September 2010	001	00010	Water Temperature			AB	9/1/2010
3IC00026*CD	September 2010	001	50050	Flow Rate			AD	9/30/2010
3IC00026*CD	September 2010	001	61942	pH, Minimum			AD	9/30/2010

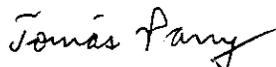
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The current NPDES permit expires on August 31, 2011. Ohio EPA has received a renewal application, and will begin processing it shortly. Once the new NPDES permit is issued, Ohio EPA advises that the permittee read through it carefully because there will be a number of changes made to it. One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. Monitoring requirements for E. coli, and all other new parameters, will be described in the new permit.

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Please supply to this office, within 10 days receipt of this letter, a written response summarizing the actions that will be taken to address all of the findings from the inspection. Your response shall include specific dates for implementation of the proposed actions. Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/mt

cc: Chuck Prachik
Eric Marsh

ec: Erm Gomes, Ohio EPA, NEDO, DSW
Dean Stoll, P.E., Ohio EPA, NEDO, DSW

File: Industrial/PC/RMI Niles