



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 29, 2009

RE: SHERMAN INTERNATIONAL
CAMPBELL WORKS
NPDES PERMIT NO. 3ID00036

Mr. Om P. Sharma
Sherman International
367 Mansfield Avenue
Pittsburgh, PA 15220

Dear Mr. Sharma:

On July 22, 2009, this writer inspected Outfall 007 which is associated with the Sherman International property in Campbell, Ohio. The property is formerly identified as the Campbell Works of LTV Steel. Outfall 007 has historically been identified as a point of discharge of oil to the Mahoning River. The oil is associated with petroleum contamination of groundwater on the Sherman property.

A recent inspection of a monitoring well located on the Sherman International property identified approximately two feet of free product in the well. The resulting groundwater contamination of petroleum is from past steel making operations. Previous investigations of the site have identified the petroleum seeping into the storm sewer and discharging to the Mahoning River through Outfall 007. As current owner of the property, Sherman International is considered the responsible party for mitigating the contamination.

On March 1, 2005, the NPDES Permit No 3ID00036*XD was issued to Sherman International. The NPDES Permit is a requirement of the federal Clean Water Act and is issued by Ohio EPA under the authority of Ohio Revised Code 6111.04. The permit is intended to prevent the contamination of the Mahoning River from the Sherman property by establishing discharge requirements and pollutant limits. The NPDES Permit contains a requirement that only uncontaminated groundwater and storm water may be discharged through Outfall 007. Be advised that the discharge of the oil to the Mahoning River is a violation of the NPDES Permit No. 3ID00036. The discharge of oil through Outfall 007 also constitutes a violation of Ohio Revised Code 6111.07 and Ohio Administrative Code 3745-01-04.

Sherman International has recently been provided at least two proposals for initiating an investigation into the extent of contamination impacting Outfall 007. Both proposals include activities to determine the extent of contamination of the petroleum and to subsequently establish remedial actions to mitigate impacts. It is the expectation of this

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office that no later than August 10, 2009, Sherman International will review the proposals and enter into a contract with one of the consulting firms to initiate remedial actions. Sherman International shall notify this writer no later than August 10, 2009 as to which plan was selected. Be advised that this office will initiate enforcement action against Sherman International in the event timely action is not taken by August 10, 2009. Once the preliminary investigation is completed, the results must be submitted to this office along with a concept plan for remedial actions.

You may contact this writer at (330) 963-1251 to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Jim Carano, Health, Environmental, Loss Prevention, Inc.
Krishna Sharma, Chairperson, Sherman International Corporation

File: Industrial/Sherman International/Permits and Compliance