

**Environmental  
Protection Agency**

John Kasich, Governor  
Robert F. Utter, Lt. Governor  
Michael S. DeWine, Director

January 6, 2011

RE: SHERMAN INTERNATIONAL  
CAMPBELL WORKS  
NPDES PERMIT NO. 3ID00036  
2011 CEI/NOTICE OF VIOLATION

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

**CERTIFIED MAIL**

Mr. Sharma:

On September 16, 2010, this writer conducted an inspection of the Sherman International site in Campbell, OH. The intent of the inspection was to evaluate the groundwater recovery system to determine if it was operational and being maintained. Since the system was partially discharging in the summer of 2010, a review of the monitoring data was also conducted. Following are observations at the time of the inspection.

Observations:

1. A significant amount of oil was discharging through outfall 007 to the Mahoning River on the day of the inspection. A rain storm event had occurred just prior to the inspection, and the storm water was pushing oil out of outfall 007. The oil was flowing under the booms placed at the outfall to contain oil from the Sherman property. A plum of oil was identified in the Mahoning River for approximately 100 ft. downstream of the outfall. The discharge of oil constitutes a violation of Part III.2.B of the NPDES Permit.
2. Sump No.1 was uncovered at the time of the inspection. The lid to the sump was positioned approximately five feet from the sump. The uncovered sump created a dangerous situation where people and animals may fall into the pit.
3. Only eight of the recovery wells appeared to have been activated over the summer. A number of the wells were not yet activated.
4. The pneumatic lines to the activated wells were on the surface of the ground. It was understood that the lines will be buried to prevent freezing and damage.
5. A sump on the Mahoning River side of the building was full of oil and water. The contents of the sump were near overflowing onto the ground.
6. The large white tank was approximately half full of oil and water. The contents of the tank must be monitored and hauled off-site for disposal or recycle when the contents approach the opening.
7. There were numerous bags of refuse material left in the spill containment area around the large, white tank. The bags nearly covered the entire bottom of the spill containment area. The presence of the refuse material reduced the storage volume of the spill containment area.

8. During the 45 minute inspection of the ground water recovery system, no indications that the system was active were identified. None of the recovery wells were active during the inspection. No sounds indicating the system was operational were observed during the inspection. The building was locked and could not be inspected to determine the condition of the system.

The system must be operational at all times in order to minimize the discharge of oil to the Mahoning River. Following is a list of actions agreed to by Sherman International for bringing and maintaining the entire system online. Sherman international agreed to have the entire system operational and have all air supply lines buried by the end of 2010.

- i) All of the recovery wells were to immediately be repaired and made operational.
- ii) Both sumps were to be made operational.
- iii) The entire groundwater recovery system was to be made operational and be maintained at all times.
- iv) The pneumatic lines were to be buried. The lines already in place were to be immediately buried and any new lines to wells not yet integrated into the system were to be buried no longer than 3 days from the time the well is activated.
- v) The sump on the river side of the building was to be immediately pumped and the contents properly recycled or disposed.
- vi) The refuse being stored in the containment area around the white tank was to be immediately removed for proper disposal.
- vii) The cover for sump 1 was to be immediately replaced over the pit opening.
- viii) Sherman International must take all steps necessary to keep the system operational and to minimize the oil entering the Mahoning River from the Sherman property.

A follow up inspection showed that items v, vi, and vii had been addressed, however, it was understood during the inspection that the system was in need of a new or repaired compressor. The compressor in use at the time of the inspection did not have sufficient capacity to operate the entire system. Please provide an update to this office regarding the status of the air supply system, and indicate if the entire groundwater recovery system has been made operational. Include an update with regards to items i, ii, iii, and iv above.

#### Compliance Review:

The monitoring data for the groundwater recovery system was reviewed as part of this inspection. The monitoring reports are submitted each month by Sherman International. Based on the reports submitted, Sherman International certified that no flow had discharged from the groundwater recovery system in July and August of 2010. However, it was the understanding of

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this writer in talking to representatives of the Howland Company, that during July and August, the groundwater recovery system was partially activated and that the system was discharging treated groundwater. If this understanding is accurate, Sherman International is in violation of the NPDES Permit for improper reporting.

Be advised that if there is a discharge from the system at any time during a particular month, the discharge must be properly sampled and analyzed, and the results submitted to Ohio EPA in accordance with the requirements of the NPDES Permit.

Sherman International did submit a self-monitoring report for November 2010. The report included a permit violation for pH.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2010	pH	1-Day Conc.	6.5	6.49	11/15/2010

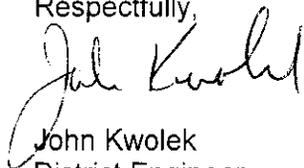
Be advised that violations of the NPDES constitute violations of Ohio Revised Code (R.C.) 6111.07 and are subject to enforcement action.

NPDES Permit:

The NPDES Permit has been expired since February 28, 2010. Sherman International is in violation of the NPDES Permit for failure to submit the renewal application in accordance with page 1, paragraph 4 of the permit.

You may contact this writer at (330) 963-1251, or at [john.kwolek@epa.state.oh.us](mailto:john.kwolek@epa.state.oh.us) to discuss any questions you may have regarding this inspection report.

Respectfully,



John Kwolek  
District Engineer  
Division of Surface Water

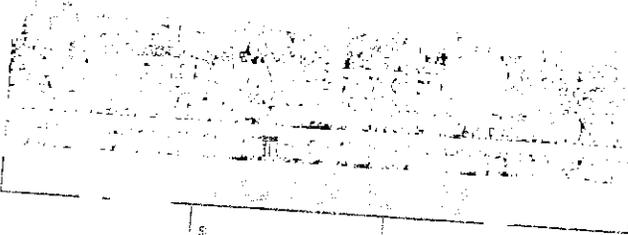
JK/mt

cc: Krishna Sharma, Chairperson, Sherman International Corporation  
Martha Horvitz, Ohio EPA, Legal, CO  
Carmen Conglose, Howland Company

ec: Amy Alduino, Department of Development  
Sue Watkins, Ohio EPA, DERR, NEDO

File: Industrial/Sherman International/Permits and Compliance

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