



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 14, 2009

RE: WAYNE COUNTY
TRICOR METALS
3IS00117

Mr. John Stitzlein
Tricor Metals
3225 West Old Lincoln Way
Wooster, OH 44691

Dear Mr. Stitzlein:

On June 25, 2009 this writer met with Leroy Sponaugle and you to conduct an inspection of your facility. The intent of the inspection was to conduct an operation and maintenance inspection of industrial process and the sewage treatment plant serving the above referenced facility.

Below are the findings and recommendations from the inspection:

- 1) Tricor Metals fabricates reactor vessels, heat transfer equipment, and piping systems made of titanium, tantalum, and other materials. In addition, Tricor Metals also sells titanium, tantalum, and/or hastelloy in the form of pipe, fittings, bar, plate, sheet and fasteners. It is understood Tricor Metals uses hydrostatic test wastewater, fabrication sump groundwater, and storm water as the wastewater discharged through the National Pollutant Discharge Elimination System (NPDES) outfall 001. The process water is hauled in from the City of Wooster. The process water drains to the water table sump in the fabrication pit and discharges to the NPDES outfall 001. The final outfall was clear and was in good condition.
- 2) The existing wastewater treatment plant consists of an aeration package plant, sand filters, chlorine contact tank and evapo-transpiration tile field. The inspection of the existing wastewater treatment plant revealed the blowers were not operating and no air was circulating within the tank. It is understood the air supply to the aeration tanks are set on a timer and run 15 minutes every hour. It was indicated the blowers are set on timers due to the wastewater treatment plant not receiving enough wastewater to run all day. The color in the aeration tank was a dark color which indicates the tanks may be turning septic. It is recommended you balance the air supply to all the diffusers and ensure a steady low supply of air is provided to the aeration tank. It is important to maintain a balanced solids load in the system in order to achieve a more effective treatment system. The aeration tank is where approximately 90% of the treatment occurs and requires some operational experience to maintain. Enclosed is a copy of an operation and maintenance manual created to guide owners of package extended aeration treatment plants.
- 3) The clarifier portion of the tank was in operation and some floating solids were visible on the surface of the tank. The weirs and influent baffle had solids accumulating in them. It is understood the sidewalls of the clarifier are scraped down every week. The chlorinator appeared to be in good condition.

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- 4) A review of your eDMR data from January 1, 2007 through May 1, 2009 revealed frequent use of the AH code for parameters Nitrogen Ammonia and Nitrogen Nitrate. When using the AH code, a reason for using the AH code is required to be provided in the comments section of the eDMR. The reason provided in comment section of the eDMR is ".00". Please note, if the reason code was meant to state the level was "below detect", the code for this is "AA".

Any reporting errors or eDMR errors must be reported to this office so the error can be resolved. You may contact Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

- 5) According to Parts 4, 5 and 6 of your NPDES permit, you are required to develop a Storm Water Pollution Prevention Plan (SWP3). The SWP3 must be for the entire facility (interior and exterior operations) and must include Best Management Practices for your site, Spill Prevention and Response, and any other waste handling and site management practices that would be best fit for your site. In addition, records keeping is also an important aspect of the SWP3. To date, this has not been completed and is a violation of this permit. As such, this office requests you complete the SWP3 no later than September 15, 2009. Information on the preparation of the SWP3 can be found at:

http://www.epa.state.oh.us/dsw/storm/construction_index.html#Information

http://www.epa.state.oh.us/dsw/storm/industrial_index.html#Information

The NPDES permit for this facility expires May 31, 2010. Please be aware, your renewal application is due to this office six months before this expiration date. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

Enclosure: Wastewater Treatment Plant Manual

cc: Wayne County Health Department

File: Industrial/Permit Compliance/Tricor Metal