



**Environmental
Protection Agency**

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

April 19, 2011

RE: REPUBLIC ENGINEERED PRODUCTS
PERMIT NO. 3ID00028
LORAIN COUNTY
LORAIN

Mr. Curt Anderson, Plant Manager
Republic Engineered Products
1807 E. 28th Street
Lorain, Ohio 44055

Dear Mr. Anderson:

On March 16, 2011, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Jay E. Lawniczak, Environmental Operations Manager. The purpose of the inspection was to: (1) visually examine each permitted outfall (2) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (3) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. The hot end of the plant is not operating. The iron and steel making operations along with the associated outfalls have been down since December 2008.
2. All of the permitted outfalls were observed. No visual impact to the receiving stream was noted.
3. Outfalls 3ID00028014 and 3ID00028015 were tied into outfall 3ID00028010.
4. The lab analysis is performed by Test America North Canton.
5. The facility's renewal permit is currently being drafted and will be public noticed in the near future. During public notice you will have a 30 day period to evaluate your permit and comment in writing any concerns you may have

This office has recently reviewed your self-monitoring reports covering the period January 1, 2008 through February 28, 2011 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Code Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	50050	Flow Rate			AD	7/2/2008

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
002	50050	Flow Rate	1/Week	1	0	01/15/2008
605	00530	Total Suspended Solids	1/Week	1	0	01/01/2011
605	50050	Flow Rate	1/Week	1	0	01/01/2011
605	00400	pH	1/Week	1	0	01/01/2011

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Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
605	00550	Oil and Grease, Total	1/Week	1	0	01/01/2011
605	00530	Total Suspended Solids	1/Week	1	0	01/08/2011
605	50050	Flow Rate	1/Week	1	0	01/08/2011
605	00400	pH	1/Week	1	0	01/08/2011
605	00550	Oil and Grease, Total	1/Week	1	0	01/08/2011
605	00530	Total Suspended Solids	1/Week	1	0	01/15/2011
605	50050	Flow Rate	1/Week	1	0	01/15/2011
605	00400	pH	1/Week	1	0	01/15/2011
605	00550	Oil and Grease, Total	1/Week	1	0	01/15/2011
605	00550	Oil and Grease, Total	1/Week	1	0	02/15/2011
605	00530	Total Suspended Solids	1/Week	1	0	02/15/2011
605	50050	Flow Rate	1/Week	1	0	02/15/2011
605	00400	pH	1/Week	1	0	02/15/2011
605	00550	Oil and Grease, Total	1/Week	1	0	02/22/2011
605	00530	Total Suspended Solids	1/Week	1	0	02/22/2011
605	50050	Flow Rate	1/Week	1	0	02/22/2011
605	00400	pH	1/Week	1	0	02/22/2011

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
602	01092	Zinc, Total (Zn)	30D Qty	0.703	.86623	4/1/2008
602	01092	Zinc, Total (Zn)	1D Qty	2.11	4.22406	4/9/2008
602	32730	Phenolic 4AAP, Total	1D Qty	0.313	.40878	11/19/2008
004	00400	pH	1D Conc	9.0	9.1	12/3/2008
005	61425	Acute Toxicity, Ceriodaphnia	1D Conc	1.0	1.8	2/13/2009

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
 Environmental Engineer
 Division of Surface Water

MWS/mt

pc: Jay E. Lawniczak, Republic Engineered Products