

**Environmental
Protection Agency**

1000 East Broad Street
Columbus, Ohio 43260-9001
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www.epa.gov
Governor
Lt. Governor
Director

September 7, 2011

RE: Mahoning County
V & M Star
NPDES Permit No. OHC000003
Ohio EPA Permit No. 3GC04319*AG
Construction Storm Water Inspection

Jeff Bindas
V & M Star
2669 Martin Luther King, Jr. Blvd
Youngstown, Ohio 44510

Chuck Shasho
City of Youngstown - Engineering
5th Floor, City Hall
26 South Phelps Street
Youngstown, Ohio 44503

Dear Mr. Bindas and Mr. Shasho:

On August 10, 2011 and August 11, 2011, Ohio EPA conducted a stormwater inspection at V & M Star, located at 2669 Martin Luther King Jr. Blvd., City of Youngstown, Mahoning County (site) and Roger Lindgren Way, respectively. On August 10, 2011, I was accompanied by Dean Stoll and Tomas Parry of Ohio EPA. The site was represented by Jeff Bindas of V & M Star; Steve Cianciolo and Joseph Mook of Howland Company, LLC; and Jacquelyn Workman of Phi Environmental Consulting. On August 11, 2011, the site was represented by Kedar Bhide of the City of Youngstown; Ken Johnson of V & M Star; Jim Huffman and Randell Sawdey of Integrated Project Resources; and Tim Marucci of Marucci and Gaffney. Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GC04319*AG.

Storm Water Inspection:

A. V & M Star (August 10, 2011)

- The dewatering skimmer installed on sediment basin No. 1 (SB1) did not appear to be functioning correctly as it was impounded by sediment. Erosion gullies have formed on SB1's northwestern embankment directly adjacent to the dewatering skimmer.

Mr. Cianciolo details in an August 16, 2011 email that a permanent solution to the dewatering skimmer impoundment issue has been implemented as the use of grading, rip-rap, silt fence, and sediment removal activities have been implemented.

- Excessive offsite tracking of sediment and dust generation was documented to be resulting from the soil removal operations associated with "Mount Russell." Dust minimization measures (i.e. watering, etc.) and increased sweeping frequencies must be implemented to minimize the offsite tracking of sediment. In addition, stabilization of disturbed portions of the site where the soil removal operations are located must occur as this area becomes idle.
- No best management practices have been implemented on the dumpsters utilized to store solid waste. Please be aware that precipitation that contacts solid waste is classified as a leachate that must be properly managed. Best Management Practices (BMP) must be implemented to prevent the discharge of non-sediment pollutants to the drainage system of the site or "surface waters of the State." Ohio EPA recommends tarping or lining the dumpsters to prevent pollutants from being discharged.

B. Roger Lindgren Way (August 11, 2011)

- The exfiltration trenches that have been installed on Roger Lindgren Way have become impacted from the excessive amount of sediment being tracked offsite. The exfiltration trenches must be cleaned upon the completion of the soil removal operations associated with "Mount Russell." Approximately 10,000 tons of soil is currently being removed from "Mount Russell" per day.
- The storm sewer outfalls must be modified to have rip-rap and geotextile fabric installed in order to prevent erosion from occurring between the Mahoning River and Roger Lindgren Way.
- The silt fence that has been installed between the Mahoning River and Roger Lindgren Way must be repaired.
- Sweeping of Roger Lindgren Way has been increased to nine hours per day. In addition, the City of Youngstown has started sweeping Division Street on an as needed basis. Street sweepers were documented removing sediment from Roger Lindgren Way and Division Street during the inspection.

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Ohio EPA will re-inspect the site in approximately two weeks to verify that the site is in compliance with the General Storm Water Permit. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118, or via e-mail at chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/cs

cc: Mayor and Council
City of Youngstown

ec: Jeff Bindas, V&M Star
Ken Johnson, V&M Star
Tina Hertzell, Integrated Project Resources
Jim Huffman, Integrated Project Resources
Randell Sawdey, Integrated Project Resources
Joe Mook, Howland Company LLC
Steve Cianciolo, Howland Company LLC
Jacquelyn Workman, Phi Environmental Consulting
Chuck Shasho, City of Youngstown
Kedar Bhide, City of Youngstown
John Pierko, MS Consultants
Brian Hughes, MS Consultants
Sean Conrad, MS Consultants
Tim Marucci, Marucci and Gaffney