



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Richland County  
Tube City  
NPDES Permit #2IN00076

November 14, 2007

Mr. Mike Connolly  
Tube City IMS  
1155 Business Center Drive  
Horsham, Pennsylvania 19044-3454

Dear Mr. Connolly:

On October 18, 2007, an inspection was made of the Tube City scrap metal facility located at 1344 Bowman Street, Mansfield, Richland County. This inspection was conducted in order to determine compliance with the facility's NPDES permit # 2IN00076 for the discharge of stormwater from the site. Mr. John Young, Assistant General Manager, was present during the inspection to provide a tour and answer any questions.

The facility has a settling pond that provides treatment to stormwater before being discharged off site. The pond was not able to be directly observed during the inspection due to excessive growth of vegetation. The outlet from the pond was observed as well as the sampling location. It was observed that the ditch along the western side of Poth Road was almost completely full of sediment. This ditch drains the northeast corner of your site where the lime is received and stored, as well as some of the southern portion of the site. Various large piles of spent lime and sediment were observed along Poth Road and the eastern edge of your facility. The runoff from these piles drains directly to the ditch or offsite and not through the settling pond. Our office is very concerned with the amount of sediment being discharged from your site.

Part IV of your NPDES permit requires that a storm water pollution prevention plan (SWP3) be developed and kept on site. Part IV section D.2.a.1 requires that a site map indicating an outline of the drainage areas for each storm water outfall, each existing control measure to reduce pollutants in stormwater runoff, and surface water bodies be included as part of the SWP3. This map should be up to date and reflect current site conditions. At the time of the inspection Mr. Young was unable to find a copy of the SWP3. **Within 14 days** of receipt of this letter please submit a copy of this map to our office for review. Once this map is received a follow up inspection will be scheduled to further evaluate the site and determine the best course of action regarding the excessive sediment discharges.

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A review of the monthly operating reports submitted to our office for January 2005, through September 2007, revealed five violations of the limits contained in your NPDES permit during this period. Four of these violations were for pH exceedences and one was for oil and grease.

Your current NPDES permit is issued to Tube City, LLC, as the legally responsible party for the facility. It appears that since the permit issuance in 2004, Tube City has joined with IMS to form Tube City IMS Corporation headquartered in Glassport, PA. The NPDES permit needs to be transferred to this new corporation. It will be necessary to submit an application to transfer the NPDES permit **within 30 days** of receipt of this letter. A copy of the transfer application form is enclosed.

If you have any questions please call me at 419-373-3070. We look forward to meeting you onsite again in the near future.

Sincerely,



Walter Ariss  
Environmental Specialist II  
Division of Surface Water

/llr

Enclosure

cpc: ~~DSW-NWDO~~ File