Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

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August 19, 2011

RE: HARBISON-WALKER REFRACTORIES
PERMIT NO. 3IE00043
PORTAGE COUNTY
WINDHAM

Mr. Joseph Berger
Facility Engineer
9686 East Center Road
P.O. Box 490
Windham, Ohio 44288

Dear Mr. Berger:

On July 20, 2011, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Joseph E. Berger, Facility Engineer and Mr. Brett Bunker, Safety Coordinator. The purpose of the inspection was to: (1) examine the facility's outfalls and receiving stream along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) 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 facility currently employs 95 hourly employees and 26 salaried employees.
2. The facility source of water for its once through noncontact cooling water is from the Village of Windham Water Treatment Plant.
3. The facility is served by the Village of Windham Wastewater Treatment Plant.
4. The facility has historically had violations of its NPDES permit for oil & grease at station 3IE00043**601**. It is believed that this problem has been recently resolved.
5. You indicated that a plug was installed at station 3IE00043**601** on February 19, 2010. You also indicated that the source of the oil & grease violations was never determined.
6. Previously, the flow from station 3IE00043**601** was discharged through outfall 3IE00043**001**.
7. The facility recently rerouted the noncontact cooling water which discharged through sampling station 3IE00043**601** to outfall 3IE00043**002**. In addition the roof top stormwater was also rerouted so that it no longer discharges through station 3IE00043**601**.
8. With the elimination of station 3IE00043**601**, noncontact cooling is no longer being discharged through outfall 3IE00043**001**. Therefore, the facility is proposing to move the location of outfall 3IE00043**001** since its existing

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location contains flow from the city. The proposed location is slightly upstream in the parking lot on the north side of the plant where it will contain only stormwater from the facility.

9. As discussed, this office is unable to move the location of outfall 3IE00043**001** due to data history associated with the outfall. However, outfall 3IE00043**001** can be eliminated and a new outfall number, 3IE00043**006**, can be created for the proposed new stormwater sampling location.
10. Outfalls 3IE00043**001** and 3IE00043**002** were both inspected. Both discharges were clear. However it was evident that oil & grease was released in the past. Floating oil booms downstream of outfall 3IE00043**001** had some oil accumulation.
11. You indicated that the oil booms at outfalls 3IE00043**001** and 3IE00043**002** were scheduled to be changed out in August/September 2011.
12. A couple of old oil booms were observed downstream of outfall 3IE00043**001**. You indicated that you would have these booms removed from the stream.
13. Northcoast Lab (Streetsboro, Ohio) collects the samples at outfalls 3IE00043**001** and 3IE00043**002** and performs the analytical analysis.
14. Mr. Bunker submits the data through Ohio EPA's Electronic Discharge Monitoring Report (e-DMR) system. You indicated that this allows the facility to keep better track of their compliance.
15. It was observed that better housekeeping operations are required in the following areas due to the excessive solids build up from entering waters of the state via the storm sewers:
    a. Area by dumpster, See Figure 1
    b. Emag conveyer belt area , See Figure 2
    c. Storm manhole by the Praxair system, See Figure 3
16. Mr. Bunker performs monthly stormwater inspections at the facility. The above areas may need to be monitored more frequently.
17. You indicated that the yard area is swept once a month by Everbrite. More frequent sweeping may be required.
18. The facility's Stormwater Pollution Prevention Plan, SWPPP, was last updated in April 2011. The facility's SWPPP should directly address the areas listed in item 15 above.
19. Plant wide stormwater training was provided on December 7, 2010.
20. Due to a significant increase in the facility's water rates, the facility is considering converting the existing system to a closed loop system within the next year.
21. If a closed loop system is installed, the facility will need to request to have its NPDES permit modified.
22. The facility's NPDES permit is scheduled to expire on October 31, 2011.
23. The facility's NPDES 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 October 1, 2009 through May 31, 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:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	00550	Oil and Grease, Total	1D Conc	10	15.	10/8/2009
601	00550	Oil and Grease, Total	1D Conc	10	21.	10/28/2009
002	00400	pH	1D Conc	9.0	9.1	12/21/2010
002	00400	pH	1D Conc	9.0	9.26	4/4/2011

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
002	50050	Flow Rate	1/2Weeks	1	0	04/15/2010

Please notify this office in writing, within 14 days receipt of this letter, of your intentions to resolve items 12, 15, 16, 17, and 18. A follow-up inspection will be conducted subsequent to the completion date.

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 regarding this letter, do not hesitate to contact me at (330) 963-1143.

Respectfully

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt

Figure 1

Figure2

Figure 3