



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

September 14, 2009

Re: Washington County
Eramet Marietta, Inc.
Compliance Sampling Inspection (CSI)
Correspondence (IWW)

Mr. Frank Bjorklund, CEO
Eramet Marietta, Inc.
P.O. Box 299
Marietta, Ohio 45750

Dear Mr. Bjorklund:

On June 1 and 2, 2009, a Compliance Sampling Inspection (CSI) was conducted at Eramet Marietta's facility. The purpose of the inspection was to determine Eramet's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit and companion Director's Final and orders (DFFOs). Present for the inspection were Jason Canterbury, John Hooper and Jim Thorn representing Eramet and Joann Montgomery and Stephen Wells representing Ohio EPA, Southeast District Office, Division of Surface Water. Wastewater samples were collected as part of the inspection. A copy of my inspection report and the wastewater sample results are attached.

As a result of my inspection, I have the following comments:

1. Due to a reduction in production in the Electrolytic Chromium process, the pH of the upper impoundment is dropping. Eramet is trying to determine if the drop of pH is the cause for the hexavalent chromium NPDES Permit effluent violations.

Eramet has tried adding additional lime to raise the pH. This has not been as effective. Eramet is looking at adding ferrous sulfate in different locations within the upper impoundment to help treat hexavalent chromium. This is acceptable as long as the additional locations allow for the adequate settling of solids before discharge. Please update this office on the status of the changes being made.
2. As mentioned above, production at the entire facility has been curtailed. The furnace operations were at 30% and Electrolytic Chromium was down to 12 cells out of 88 at the time of the inspection.
3. Ohio EPA is continuing to work with USEPA on reviewing the Fundamentally Different Factor (FDF) Request for Ammonia. Once the review is complete, a renewal NPDES Permit can be issued for the facility. Ohio EPA will keep Eramet informed of any progress on the FDF.

4. After a review of the analytical results, there was a noticeable difference in the analytical results between Ohio EPA's and Eramet's results. The results are: Total Suspended Solids at Outfalls 605 and 008; hexavalent chromium at Outfall 605; and zinc at Outfall 008. Eramet needs to review its QA/QC for these parameters.
5. Ohio EPA's results also show hexavalent chromium loading effluent loading limit to be above the effluent limitation in the NPDES Permit. However, the concentration is below the PQL for hexavalent chromium of 0.05 ug/l listed in Part II of the NPDES Permit.

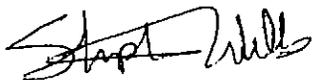
The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (614) 644-3469 or me for additional information.

In conclusion, Eramet Marietta appeared to be in compliance with its NPDES Permit and companion Director Final Finding and Orders (DFFOs) at the time of the inspection.

Please respond in writing to comments #1 and 4 within 20 days of receipt of this letter.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/mlm

Attachment

c: Jason Canterbury, Eramet

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0ID00001*ED	OH0004006	June 1 & 2, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Eramet Marietta, Inc. State Route 7, North Marietta, Ohio 45750	9:00 a.m.	November 1, 1996
	Exit Time	Permit Expiration Date
	11:00 a.m.	March 31, 1999

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jason Canterbury, Environmental Health and Safety Specialist	(740) 376-5921
Name, Address and Title of Responsible Official	Phone Number
Frank Bjorklund, CEO Eramet Marietta, Inc. P.O. Box 299 Marietta, OH 45750	(740) 374-1120

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>S</u> Other
<u>N/A</u> Collection System		

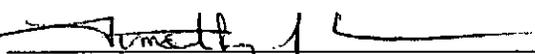
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.


Stephen Wells, Inspector, Ohio EPA, Southeast District Office

9/10/09
Date


Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

9/11/09
Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee		X ¹		
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X ²			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X ³			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

- Comments:**
1. Eramet Marietta, Inc. is now owner of the facility.
 2. NPDES Permit Application includes production rates for El Mang process, which has been shut down.
 3. Eramet is feeding ferrous sulfate to help with treatment of hexavalent chromium.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in Director's Final Finding and Orders				
e. Permittee is meeting compliance schedule	X			

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>x</u> Dual Feed	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>3</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class:	X			
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection	X			
j. Regulatory agency notified of bypasses _____ on MORS _____ 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments:

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): 3/24/92 Submitted Date
06-056IN Approval Number
 _____ Not submitted
 _____ N/A

	Yes	No	N/A	NE
b. Sludge Management Plan current	X			
c. Sludge adequately disposed (Method: <u>(1)</u>)	X			
d. If sludge is incinerated, where is ash disposed of?		X		
e. Is sludge disposal contracted (Name: _____)		X		
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP	X			
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

1. Sludge from the sanitary wastewater treatment plant is land applied to closed fly ash landfill.

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: ___ ultrasonic & parshall flume ___ calculated from influent ___ weir <u> X </u> Other (Specify: <u> (1) </u>) ___ ultrasonic & weir				
b. Calibration frequency adequate (date of last calibration <u> Feb., 2009 </u>)	X			
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: <u> X </u> Daily ___ Weekly ___ Monthly ___ Other				

Comments: 1. 003 – Calculated from Influent; 008 – V notch weir; 602 – Rectangular weir; 605 – AAS/ultrasonic (height vs. velocity); 603 – estimate, discharge only occurs if mechanical failure.

Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used	X			
Conform with 40 CFR 136.3	X			
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)	X			
b. If alternate analytical procedures are used, proper approval has been obtained			X	
c. Analyses being performed more frequently than required by permit	X			
d. If (c) is yes, are results reported in permittee's self-monitoring report	X			
e. Commercial laboratory used				
1. Parameters analyzed by commercial lab: BOD, Fecal Coliform, metals (except chromium, cadmium, zinc, lead and manganese). Bioassay – Reich Labs.	X			
2. Lab name: Microbac				

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained			X			
g.	Satisfactory calibration and maintenance of instruments and equipment			X			
h.	Adequate records maintained			X			
i.	Results of latest U.S. EPA quality assurance performance sampling program:						
	Date:	June/July 2008	<input checked="" type="checkbox"/>	Satisfactory			
			<input type="checkbox"/>	Marginal			
			<input type="checkbox"/>	Unsatisfactory			

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
003	None	None	None	None	None	Clear	
602	None	None	None	None	None	Clear	
605	None	None	None	None	None	Murky	
008	None	None	None	None	None	Clear	

Comments:

MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments:

Complete as appropriate for sampling inspections
Do not attach this page when completing reports for evaluation inspections

L. SAMPLING PROCEDURES (FOR CSI'S)

- Grab samples obtained
- Composite obtained
- Compositing frequency Various Preservation Ice
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device
- Sample refrigerated during compositing: Yes: No:
- Sample representative of volume and nature of discharge

Comments: