



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

December 22, 2009

Re: Monroe
Ormet Primary Aluminum
2010 CEI
Correspondence (IWW)

Mr. John Reggi, Director
Corporate Environmental Services
Ormet Primary Aluminum
P.O. Box 176, SR 7
Hannibal, Ohio 43931

Dear Mr. Reggi:

On October 29, 2009, I conducted a Compliance Evaluation Inspection at Ormet Primary Aluminum located in Hannibal, Ohio. Jake Greuey, with this office, assisted me with the inspection. Tim Adamowicz and Joe Rykowski represented Ormet and accompanied me during the inspection. The purpose of the inspection was to determine Ormet Primary Aluminum's compliance with NPDES Permit Number 0IE00005*LD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

As a result of the inspection and review of our files, I have the following comment:

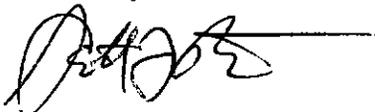
1. There were numerous NPDES violations in the past year. Ohio EPA has taken formal enforcement action against Ormet and DFFO's should be journalized in the near future.

Attached is a copy of the inspection report which indicates marginal evaluations of the following areas: Operations and Maintenance, Effluent/Receiving Waters, Facility Site Review. I rated these areas as marginal due to the above mentioned comment. Ormet should take the appropriate actions to return the facility to compliance with all terms and conditions 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Foster", with a horizontal line extending to the right from the end of the signature.

Scott Foster
Environmental Specialist 2
Division of Surface Water

SF/dh

Enclosure

- c: Tim Adamowicz, Environmental Supervisor
- c: Joe Rykowski, Environmental Technician

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IE00005*LD	OH0011550	October 29, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ormet Primary Aluminum Corporation Hannibal Reduction Division PO Box 176, SR 7 Hannibal, Ohio 43931	10:35 am	December 1, 2007
	Exit Time	Permit Expiration Date
	12:45 pm	July 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Tim Adamowicz, Environmental Supervisor Joe Rykowski, Environmental Technician	740-483-2649
Name, Address and Title of Responsible Official	Phone Number
John Reggi, PO Box 176, SR 7, Hannibal, Ohio 43931	740-483-2659

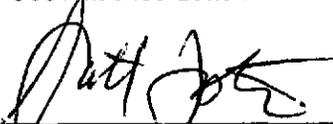
C. AREAS EVALUATED DURING INSPECTION

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

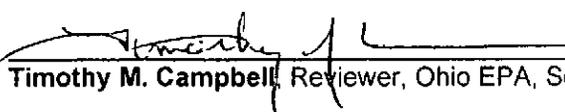
See Attached Letter.



Scott Foster, Inspector, Ohio EPA, Southeast District Office

12/22/09

Date



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

12/23/09

Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X			
d. Flows and loadings conform with NPDES permit		X		
e. Treatment processes are as described in permit application/briefing memo	X			
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: d.-Copper Limit at outfall 002. 5 out of 6 potlines operating. Casting lines not operating. Outfalls 601 and 602.

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: _____			X	
e. Permittee is meeting compliance schedule			X	

Comments: a.-DFFO's in process of being finalized.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator _____ 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: <u>1</u>	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: Sewage Treatment Plant- online. Industrial Groundwater Treatment- online.
k.-Outfall 005, Suspended Solids 4/1/09. Hay bales and sediment barriers placed around basins in yard.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: 0%				
b. Any collection system overflows since last inspection (CSO _____ SSO _____)		X		
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system			X	
g. Lift station alarm systems provided and maintained	X			
h. Are lift stations equipped with permanent standby power or equivalent	X			
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection		X		
j. Any complaints received since last inspection of basement flooding			X	
k. Are any portions of the sewer system at or near capacity			X	

Comments:

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/	N/
a. Primary flow measuring device properly operated & maintained. Type of device: <u>004</u> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other <u>*</u> ultrasonic & weir _____ Specify: _____	X			
b. Calibration frequency adequate (date of last calibration: <u>August 26th, 27th 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: _____ X _____ Daily _____ Weekly _____ Monthly _____ Other				

Comments: * 001, 002, 003

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: Test America

K. 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: