



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

February 8, 2012

RE: MAHONING COUNTY  
EXTRUDEX ALUMINUM, INC.  
NPDES PERMIT NO. OHR000004  
OHIO EPA PERMIT NO. 3GR01011\*DG  
INDUSTRIAL STORM WATER INSPECTION

Brian Carder  
Extrudex Aluminum, Inc.  
P.O. Box 697  
North Jackson, OH 44451

Dear Mr. Carder:

On November 28, 2011, Ohio EPA received an anonymous complaint alleging that wastewater and aluminum chips associated with the operation of a deburring machine utilized at Extrudex Aluminum, Inc., located at 12051 Mahoning Avenue, Jackson Township, Mahoning County (facility), are being into a storm drain serving the facility. On December 7, 2011, Ohio EPA received documentation of the dumping activities that are allegedly occurring at the facility (Figure 1).

On January 30, 2012, Ohio EPA conducted an inspection at the facility, which was represented by Pat Callihn, Plant Manager; and Paul Love, HR/Safety Manager. The facility's industrial activities are categorized by Standard Industrial Classification (SIC) Code 3354: Aluminum Extruded Products, and is authorized by General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR01011\*DG.

**Site Inspection**

The inspection documented the following violations and deficiencies occurring at the facility that must be addressed via appropriate Best Management Practices (BMPs):

1. A storm water pollution prevention plan (SWP3) was available at the facility (i.e. the BMP document). Please be aware that the SWP3 must be revised to comply with the facility's new general industrial storm water permit (i.e. multi-sector general permit), once obtained;
2. Section 4.2 of the SWP3 utilizes the term "routine." The facility must incorporate a specified frequency (i.e. weekly, monthly, etc.) to replace the term "routine;"

3. Section 6.1 of the SWP3 details that annual storm water monitoring is to occur for the following parameters:
  - a. Temperature;
  - b. pH;
  - c. Oil and grease;
  - d. Suspended solids;
  - e. Cyanide;
  - f. Cadmium;
  - g. Chromium;
  - h. Copper;
  - i. Lead;
  - j. Nickel;
  - k. Silver;
  - l. Zinc; and
  - m. Mercury

The facility is not performing the annual storm water monitoring and must immediately collect samples of the discharge from the facility's storm water outfall for the above parameters, in accordance with the SWP3. A copy of the analytical results for the above parameters must be submitted to Ohio EPA. For additional information regarding storm water monitoring, please refer to the "Guidance Materials" section of this correspondence.

4. Annual comprehensive site compliance evaluations (CSCI) are not occurring at the facility. The facility must begin performing CSCI, at a minimum, on an annual basis;
5. When questioned specifically about the wastewater generated within the deburring machine, Mr. Callihn explained that the deburring machine started operating in October 2011. A soap/water mix is utilized within the deburring machine and is recycled. If the wastewater would need to be removed, Mr. Callihn explained that a contractor would be utilized;
6. Mr. Love stated that only visual monitoring is being performed. No documentation of storm water inspections are occurring. Mr. Callihn and Mr. Love clarified that the SWP3 will be revised to include daily visual inspections and monthly inspection documentation will be performed; and
7. An inspection of the storm sewer catch basins serving the facility documented aluminum scrap on the grate and around the northeastern storm sewer catch basin (Figures 2 to 3) and grey colored water pooled around the southeastern storm sewer catch basin (Figure 4), which is the complaint documentation provided in Figure 1. This appears to contradict the information provided in item No. 5 above.

Ohio EPA informed the facility to not dump any materials into the storm sewer system. Generated wastewater must be properly managed and discharged into the sanitary sewer system. In addition, general housekeeping BMPs must be improved at the facility to prevent aluminum scrap from entering the storm sewer system.

**Corrective Actions**

Appropriate BMPs must be implemented to address the above violations and deficiencies. A written report must be submitted to Ohio EPA within fourteen (14) days of receiving this notification that details how the deficiencies have been or will be addressed. The written report must also include dates detailing when each corrective action (i.e. BMP) was or will be implemented.

**Guidance Materials**

The following resources provide information that will assist in the facility's compliance:

U.S. EPA's Primary Metals Facilities Fact Sheet  
[http://www.epa.gov/npdes/pubs/sector\\_f\\_primarymetals.pdf](http://www.epa.gov/npdes/pubs/sector_f_primarymetals.pdf)

U.S. EPA's Industrial SWP3 Guidance  
[http://www.epa.gov/npdes/pubs/industrial\\_swppp\\_guide.pdf](http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf)

U.S. EPA's Industrial Sample and Monitoring Guide  
[http://www.epa.gov/npdes/pubs/msgp\\_monitoring\\_guide.pdf](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf)

Ohio EPA's Industrial Storm Water Program  
[http://www.epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx)

Ohio EPA's Industrial SWP3 Template  
[http://www.epa.ohio.gov/portals/35/permits/IndustrialStormWater\\_SampleSWP3Template.doc](http://www.epa.ohio.gov/portals/35/permits/IndustrialStormWater_SampleSWP3Template.doc)

Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail [chris.moody@epa.ohio.gov](mailto:chris.moody@epa.ohio.gov).

Sincerely,

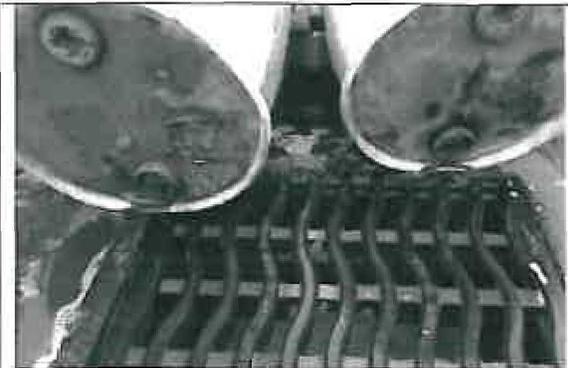


Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/cs

cc: Pat Callihn, Extrudex Aluminum, Inc.

ec: Paul Love, Extrudex Aluminum, Inc.



**Figure 1** - Picture alleging that dumping of wastewater and aluminum chips is occurring at the facility.



**Figure 2** - Aluminum scrap on the grate and around the northeastern storm sewer catch basin.



**Figure 3** - Aluminum scrap on the grate and around the northeastern storm sewer catch basin.



**Figure 4** - Grey colored water was pooled around the southeastern storm sewer catch basin.