



**Environmental  
Protection Agency**

**John R. Kasich, Governor**  
**Mary Taylor, Lt. Governor**  
**Scott J. Nally, Director**

March 1, 2012

RE: USALCO ASHTABULA FACILITY  
OHIO EPA PERMIT 3II00188\*CD  
ASHTABULA TWP., ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. Peter Askew, Vice President and Secretary  
USALCO Ashtabula Plant, LLC  
1120 Middle River Road  
Baltimore, MD 21220

Dear Mr. Askew:

On February 29, 2012, a site inspection was conducted at the above referenced facility at 3050 Lake Road East (State Route 531), Ashtabula Township, Ashtabula County, Ohio. The inspection was conducted by John Schmidt and Chris Moody of this office. Mr. Bradley Lovejoy, Plant Manager, represented USALCO Ashtabula Plant, LLC (USALCO) during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on February 17, 2012.

**Observations**

The following observations were made during the inspection:

1. Plant operations have remained unchanged since the February 17, 2011 inspection.
2. The general operation and maintenance of the stop plate and storm water collection system appeared to be satisfactory. The stop plate is inspected weekly, with records maintained by USALCO.
3. The site conducts its own pH monitoring. The pH meter is calibrated before each use.
4. Outfalls 001 and 002 have no maximum design flow, as its discharge is limited to non-contact cooling water, and storm water from areas outside of the truck loading/unloading areas on the west side of the building and the rail car unloading areas on the east side of the building.
5. A log book of repairs and observations is maintained at the facility. USALCO personnel perform routine observations, monitor the facility, and perform the sampling (flow estimation, pH, water temperature). Chuck Jacobs, under supervision of Bradley Lovejoy, prepares the electronic discharge monitoring report (eDMR) and submits of the eDMR through Ohio EPA's Web-based application.
6. In 2011, the berm around the southern truck loading/unloading area was raised to divert storm water runoff from entering the berm area.
7. The storm water pollution prevention plan (SWPPP) was updated on September 30, 2011. The annual site certification was completed on April 17, 2011, and the inspection completed on April 16, 2011 and January 23, 2012. Quarterly inspections were last completed on October 13, 2011. Employee training on the plan occurred between April 6, 2011 and April 17, 2011.

**NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period January 1, 2011 through February 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit, as follows:

Limit Violations

No effluent violations are noted for the time period reviewed, other than the unauthorized discharge noted below.

Reporting Violations

As noted in October 19, 2011 NOV, USALCO failed to timely file the May 2011 eDMR. Since receiving the NOV, USALCO submitted the May 2011 eDMR and included the required information. No additional information is needed to respond to the violation.

Compliance Schedule

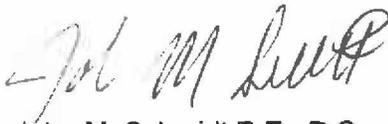
The current NPDES permit does not contain a compliance schedule.

Other Violations

1. Outfall Signage: Part II, Item G of your NPDES permit requires USALCO to post signage at its final outfalls where they discharge to Lake Erie no later than January 1, 2012. As of the date of this inspection, the signage has not been posted. Ohio EPA also recommends that signage be posted at internal monitoring stations within the USALCO facility. Please provide documentation that the outfall signage has been posted.
2. Unauthorized Discharge: On November 22, 2011, USALCO notified Ohio EPA of the release of 128 gallons of high pH water from a leaking heat exchanger. The heat exchanger was repaired and a closed-loop system installed with continuous pH monitoring. USALSO provided the appropriate notification and follow-up reports to ensure that this is not repeated, and no further information is needed to respond to the violation.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

Cc: Bradley Lovejoy, Ashtabula Plant, LLC

File: Industrial – USALCO Ashtabula Plant, LLC./pc