



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 22, 2012

RE: TRUMBULL COUNTY
RMI TITANIUM COMPANY
OHIO EPA PERMIT NO. 3IC00026
NPDES PERMIT NO. OH0010863

Richard Mason, Director – Environmental Affairs
RTI International Metals, Inc.
1000 Warren Avenue
Niles, Ohio 44446

Dear Mr. Mason:

Ohio EPA conducted a compliance evaluation inspection on March 12, 2012 at the above-referenced facility. You and Mr. Eric Marsh represented RMI Titanium Company and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the facility's treatment systems, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following observations and/or deficiencies were noted:

1. The facility's Storm Water Pollution Prevention Plan plan was reviewed, and determined to be up to date.
2. Please provide to this office copies of the most recent spill reports.
3. Please provide to this office documentation describing when the metering equipment at the sanitary package plant (Outfall 601), and the final outfall (Outfall 001), was last calibrated.
4. Please provide a description of the calibration procedures for the metering equipment used at Outfalls 001 and 601.
5. The effluent being discharged through Outfall 001 appeared to be clear.
6. Please provide a copy of the entries in the log book maintained by sanitary plant operator Dwane Stull. Specifically, please provide copies of the entries for the last year.
7. Please ensure that the grating over the disinfection chamber is cut to fit snugly over the chamber.
8. Ohio EPA understands that Dwane Stull currently makes monthly visits to the wastewater treatment plant. Please note that upon renewal of the facility's NPDES permit, there will be new language requiring the certified operator to visit the plant a certain number of times per week. With a sanitary flow of 37,500 gpd, the facility's

wastewater plant is considered to be a class I facility. Class I plants require a certified operator to be on site at least 3 times a week for a minimum of 1.5 hours total.

9. During the inspection, Ohio EPA observed several portable totes of caustic soda outside in the storage area. Please ensure that these totes are stored under roof.
10. During the inspection, Ohio EPA observed that several drums of titanium dioxide had leaked some of their contents onto the ground. While the drum area was contained, some of the free product was nearly overtopping the containment berms. Please ensure that this area is cleaned and maintained.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period May, 2011 – February, 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2011	001	31616	Fecal Coliform	30D Conc	1000	3600.	5/1/2011
May 2011	001	31616	Fecal Coliform	1D Conc	2000	3600.	5/11/2011
August 2011	001	61942	pH, Minimum	1D Conc	6.5	3.93	8/30/2011
November 2011	601	00530	Total Suspended Solids	30D Conc	30	53.	11/1/2011
November 2011	601	00530	Total Suspended Solids	1D Conc	45	108.	11/5/2011
November 2011	601	80082	CBOD 5 day	1D Conc	40	63.	11/5/2011
November 2011	601	00530	Total Suspended Solids	1D Conc	45	50.	11/22/2011
December 2011	001	00530	Total Suspended Solids	30D Qty	28.4	37.1876	12/1/2011
December 2011	001	01094	Zinc, Total Recoverabl	30D Conc	95	109.5	12/1/2011
December 2011	001	01094	Zinc, Total Recoverabl	30D Qty	0.180	.26234	12/1/2011
December 2011	001	00530	Total Suspended Solids	1D Conc	20.0	21.	12/21/2011
December 2011	001	00530	Total Suspended Solids	1D Qty	37.9	67.5622	12/21/2011
January 2012	601	00530	Total Suspended Solids	1D Conc	45	66.	1/18/2012

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IC00026*DD	January 2012	001	61942	pH, Minimum			AD	1/2/2012
3IC00026*DD	January 2012	001	50050	Flow Rate			AD	1/2/2012
3IC00026*DD	January 2012	001	61942	pH, Minimum			AD	1/1/2012
3IC00026*DD	January 2012	001	50050	Flow Rate			AD	1/1/2012

The current NPDES permit expired on August 31, 2011. Receipt of a timely renewal application authorizes RMI Titanium Company to discharge past the expiration date. Once a new NPDES permit is issued, Ohio EPA advises that the permittee read through it carefully, as there will be a number of changes made to it. One such change is that the new permit will be phasing out fecal coliform monitoring limits, and replacing them with Escherichia coli (E. coli) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting E. coli limits. Monitoring requirements for E. coli, and all other new parameters, will be described in the new permit.

RTI INTERNATIONAL, INC.

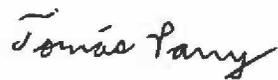
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Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address all of the items identified in this letter. Your response shall include specific dates for initiation and completion of this action plan. Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Eric Marsh, RMI Titanium Company

