



**Environmental
Protection Agency**

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

February 24, 2012

RE: MAHONING COUNTY
SHERMAN INTERNATIONAL
NPDES PERMIT NO. 31D00036
2012 CEI/NOTICE OF VIOLATION

Mr. Om P. Sharma
Sherman International
367 Mansfield Avenue
Pittsburgh, PA 15220

CERTIFIED MAIL

Mr. Sharma:

On February 14, 2012, this writer conducted an unannounced inspection of the Sherman International site in Campbell, OH. The intent of the inspection was to evaluate the groundwater recovery system to determine if it was operational and being maintained.

Observations

Following are observations made during the inspection:

1. A significant amount of oil was discharging through outfall 007 to the Mahoning River on the day of the inspection. The oil was flowing under the booms and had accumulated in the river. The discharge of oil constitutes a violation of Part I. A. 4 of the National Pollutant Discharge Elimination System (NPDES) Permit and a violation of Ohio Revised Code (R.C.) 6111.07. The discharge of oil that forms a sheen in the Mahoning River is also a violation of Ohio Administrative Code (OAC) 3745-1-04(B).
2. It was the understanding of this writer that the discharge of wastewater from the ground water recovery system was through a new, white PVC pipe that empties onto the banks of the Mahoning River. No discharge was observed through the pipe at the time of the inspection and it appeared as though it had not discharged for several days. From the attached picture, it can be seen that the snow surrounding the outfall was undisturbed. In addition, the monthly reports submitted by Sherman International have reported no discharge for the past thirteen months from January 2011 through January 2012. Be advised that failure to maintain the system is a violation of Part III. 3. A of the NPDES Permit.

You must provide a response, to this office, explaining why the system has not been operated for the past thirteen months. If it has been operated, why have reports been submitted to Ohio EPA for the past thirteen months identifying no discharge from the system? The response must be provided no later than March 9, 2012. Be advised that failure to maintain the system is a violation of the NPDES Permit and a violation of R.C. 6111.07.



The system must be operational at all times in order to minimize the discharge of oil to the Mahoning River. During the last two inspections of the system, on February 14 and January 5, 2012, the system was not being operated.

3. During a January 5, 2012 inspection of the facility, the oil storage tank was over flowing oil to the containment area. It appeared that this has been resolved at the time of the February 14, 2012 inspection when no oil was observed overflowing the tank.

You may contact this writer at (330) 963-1251, or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection report. A response to this inspection report must be provided no later than March 9, 2012.

Respectfully,

John Kwolek
District Engineer
Division of Surface Water

JK/cs

cc: Krishna Sharma, Chairperson, Sherman International Corporation
John Evan, Howland Company
Martha Horvitz, Ohio EPA, Legal, CO

ec. Amy Alduino, Department of Development
Sue Watkins-Netzly, Ohio EPA, DERR, NEDO

File: Industrial/Sherman International/Permits and Compliance

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