



**Environmental  
Protection Agency**

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

August 21, 2012

RE: ASHTABULA COUNTY  
ALERIS SPECIALTY PRODUCTS  
NPDES PERMIT NO. OHR000005  
OHIO EPA PERMIT NO. 3GR00599\*EG  
INDUSTRIAL STORM WATER INSPECTION

Thomas Fries  
Aleris Specialty Products  
2639 East Water Street  
Rock Creek, OH 44084

Dear Mr. Fries:

On July 24, 2012, Ohio EPA conducted an inspection at Aleris Specialty Products, located at 2639 East Water Street, Village of Rock Creek, Ashtabula County (site). The facility was represented by David Kern, Plant Manager, and Alex "Ron" Mullen, Responding Supervisor, during the inspection.

The facility's industrial activities are categorized by Standard Industrial Classification (SIC) Code 3341: Secondary Smelting and Refining of Nonferrous Metals and are authorized by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Industrial Activity (Multi-Sector General Permit), permit No. 3GR00599\*EG.

**Site Inspection**

The inspection documented the deficiencies occurring at the facility that must be addressed via appropriate best management practices (BMP):

- Haydite is stockpiled uncovered outdoors in an area exposed to precipitation events (Figure 1). Section 4.4 of the facility's storm water pollution prevention plan (SWP3) details that material storage shall be covered when not in use. The facility must begin covering outdoor material storage areas.
- General housekeeping measures must be significantly improved as fine materials are present on the paved areas throughout the facility resulting from being tracked, spilled, and/or transported from the loading, unloading, outdoor storage, and baghouse areas (Figures 2 to 5).
- The solid waste dumpster has not been covered. Please be aware that precipitation that contacts solid waste is considered a leachate and the Multi-Sector General Permit does not authorize the discharge of leachate to "waters of the State."
- No spill kit has been placed at the location of the diesel refueling area for accessibility in the event of a spill.

- The comprehensive compliance inspection (CCI) performed on July 21, 2011 detailed very limited information as the majority of the questions were not answered. All future CCIs must encompass completing the entire blank form provided within the SWP3 appendix.

**Storm Water Pollution Prevention Plan**

Via a July 24, 2012 e-mail from Mr. Mullen, Ohio EPA received a copy of the facility's SWP3. A review of the SWP3 indicates that it must be revised to address the following deficiency:

- Section 6.2.2 of the SWP3 states "collected sample should be stored and not disturbed in temperature controlled environment (HSE Engineer's office of Plant manager's office) for 24-hours before evaluation." This statement is incorrect as the evaluation of the sample must be performed immediately upon collection.

**Corrective Actions**

A written report must be submitted to Ohio EPA, within fourteen 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.

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

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/cs



**Figure 1** - Haydite is stockpiled uncovered outdoors in an area exposed to precipitation events.



**Figure 2** - General housekeeping measures must be significantly improved as fine materials are present on the paved areas throughout the facility.



**Figure 3** - General housekeeping measures must be significantly improved as fine materials are present on the paved areas throughout the facility.



**Figure 4** - General housekeeping measures must be significantly improved as fine materials are present on the paved areas throughout the facility.



**Figure 5** - General housekeeping measures must be significantly improved as fine materials are present on the paved areas throughout the facility