



**Environmental
Protection Agency**

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

August 22, 2012

RE: REPUBLIC ENGINEERED PRODUCTS, INC.
CANTON FACILITY
STARK COUNTY
NPDES COMPLIANCE EVALUATION INSPECTION
OHIO EPA PERMIT NO. 3ID00000*SD
APP NO: OH0006912

Jeffery Ferg
Environmental Operations Manager
Republic Engineered Products
2633 Eighth Street NE
Canton, Ohio 44704-2311

Dear Mr. Ferg:

On August 15, 2012, this writer conducted an inspection of your facility. You were present during the inspection as well as Mr. David Judkins, Republic Engineered Products. The purpose of the inspection was to follow up on my previous inspection done in April 2010 for the National Pollutant Discharge Elimination System (NPDES) permit renewal. In my inspection letter dated April 19, 2010, I closed with a number of items that needed to be addressed. This list is as follows:

- 1) The ISCO sampler refrigerator units must be repaired or replaced as soon as possible.
- 2) Appropriate thermometers must be present during sample collection to ensure proper preservation. The temperature must be maintained at four degree Celsius or less during sample storage.
- 3) The location of the flow measuring device for outfall 601 is located at a point of extreme turbulence. This may interfere with the ability to provide an accurate flow measurement. You were requested to follow up with the manufacturer to confirm whether or not it is a proper location. Noted was that you have had suspect readings in the past.
- 4) The Storm Water Pollution Prevention Plan (SWPPP) needs to be updated to address all items required in Part II of the current permit. Please be advised that the NPDES renewal will contain Parts IV, V, and VI This language that can be found in the General Industrial Stormwater Permit which can be found on our website at:

http://www.epa.state.oh.us/dsw/permits/GP_IndustrialStormWater.aspx.

The current stormwater language contained in Part II will be removed. Upon updating, we request that you submit a copy to this office for our review.

The ISCO sampler refrigerator unit at outfall 601 was not able to be reviewed because the lock could not be opened. The refrigerator unit for outfall 010 has been replaced with a portable ISCO sampler unit located adjacent to the outfall.

Action Items

- 1) It was noted before we did the inspection that Republic may or may not be conducting the annual stormwater sampling as required by the NPDES Permit in Part V. Please confirm in writing, no later than August 31, 2012, whether or not the sampling has been done. If the sampling has been done, please submit the last three years of sampling results by the aforementioned date.
- 2) No later than August 31, 2012, respond in writing to this office regarding the discharge we observed at outfall 003. Please identify the source of the turbid water, the duration, and the steps taken to eliminate the possibility of this happening again in the future.
- 3) No later than August 31, 2012, respond in writing to this office regarding the flow meter at outfall 601 and whether or not the turbid conditions can affect the validity of the measurement per the manufacturer.

Should you have any questions concerning the information contained in this letter, please feel free to contact me at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR/cs

File: Industrial Permit/Compliance

Outfall 010



Outfall 003



Nimishillen at outfall 003



Outfall 009



Outfall 011

