

**Environmental
Protection Agency**

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

September 14, 2012

RE: MAHONING COUNTY
FALCON FOUNDRY
NPDES PERMIT NO. 3IN00362
2013 CEI

Mr. Tony Colaneri
Falcon Foundry
Sixth and Water Streets
Lowellville, OH 44436
Attn: Mr. Anthony Colaneri

Mr. Colaneri:

On August 16, 2012, this writer conducted an inspection of the Falcon Foundry located at 96 Sixth Street in Lowellville. The intent of the inspection was to evaluate storm water control systems and to discuss modifications of the Storm Water Pollution Prevention Plan (SWP3). The compliance record was also reviewed as part of this National Pollutant Discharge Elimination System (NPDES) Permit.

Storm Water Best Management Practices (BMP)s

Storm water from the facility discharges to a small, unnamed tributary of the Mahoning River. The tributary is located on the east side of the property between the manufacturing facility and the sand storage area. Storm water runoff originates from roof drains, drainage from the area surrounding the manufacturing area and possibly from the sand storage area.

Several BMP had previously been installed to control the runoff of sediment and contaminants from the property; however, those BMPs have not been totally effective at controlling sediment runoff.

Following is a list of new BMPs planned for the Falcon Facility as discussed during the August 16, 2012 inspection.

1. The drive area located on the southeast side of the property was to be vacuumed to remove sediment from the drive way that drains to the small tributary during rain events. It is understood that the driveway has already been vacuumed. As agreed, the frequency of vacuuming the drive area will be once per year minimum or more often if need to control sediment runoff.

2. After vacuuming the drive, the area was to be redressed with clean gravel to cover any remaining sediment material that could runoff during precipitation events. That was to be completed no later than August 31, 2012.
3. A catch basin is to be constructed on the east side of the drive area to prevent offsite runoff from entering the drive area. It was thought that offsite runoff was flowing across the drive area and carrying sediment to the unnamed tributary. The catch basin is to be connected to an existing catch basin so that offsite runoff can be directed to the stream without flowing across the drive area. This is to be completed no later than September 30, 2012.
4. We discuss the construction of an infiltration basin in the sand pile and a diversion ditch to redirect runoff from the pile into the basin. This is intended to prevent sediment runoff from entering the tributary. The diversion ditch is to be constructed through the roadway to intercept storm water runoff and redirect it to the basin. This structural BMP is to be completed two weeks after Pennsylvania approves the use of the foundry sand for soils manufacturing in a Pennsylvania facility. As agreed, the banks of the basin will be stabilized with seeding and mulching within two weeks of completing the construction of the basin.
5. During the meeting, we talked about moving the temporary storage pile to a more secure area. I understand from your September 7, 2012 e-mail that the project is underway.
6. It was understood that Falcon committed to constructing a canopy for a roll off bin and drum storage. It was also understood that the project will be completed by the end of September. As I understand from the September 7, 2012 e-mail, that project is also underway.
7. Finally, we discussed sampling the storm drains at points that are not influenced by water in the unnamed tributary. We concurred that as long as there were no sources of stormwater downgradient of the new sampling location, sampling at the new locations would be a reasonable action to determine if the results are being influenced by the tributary.

SWP3

During the meeting, we agreed that the SWP3 would be revised by the first week in September. The revisions were to incorporate all of the structural and nonstructural BMPs discussed above. Please provide a copy of the revised SWP3 by the end of September 2012.

Compliance Review

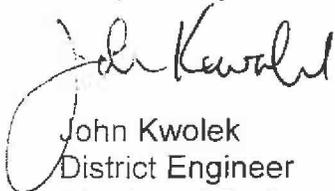
As we have discussed, no metals or Total Suspended Solids (TSS) limits have been incorporated into the permit. Only monitoring is required by the NPDES Permit. However, a review of the monitoring data identified continued high effluent

concentrations for copper and lead. The BMPs discussed during the meeting and described above are intended to address the runoff of contaminants from the Falcon facility.

One issue that needs to be addressed is that Ohio EPA is not in receipt of the July 2012 self-monitoring report. Falcon will need to submit the report by either including any monitoring data collected in July, or including the "AL" code indicating that no flow existed during the entire month. If there was flow, but no samples were collected, Falcon still needs to submit the report and provide an explanation.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cs