



**Environmental
Protection Agency**

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

Re: Putnam County
Industrial Storm Water
Steel Technologies LLC
Facility ID No. 2GR00600

September 28, 2012

Mr. Rob Vucco
Plant Supervisor
Steel Technologies LLC
740 Williamstown Road
Ottawa, Ohio 45875

Dear Mr. Vucco:

On September 21, 2012, Ryan Gierhart and I inspected Steel Technologies LLC, located at 740 Williamstown Road, Ottawa (photos taken). The purpose of our visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity (a.k.a. Multi-Sector General Permit, or MSGP). Authorization to discharge under the MSGP was granted March 1, 2012. You were present to provide information. As a result of the inspection, I have the following comments:

1. The facility processes flat rolled steel (tempering, annealing, slitting). It has a primary SIC code of 3316, Cold-Rolled Steel Sheet, Strip, and Bars. Industrial activities with potential exposure of pollutants to storm water include: outside storage of scrap metal roll-offs in the overflow area, a roll-off that was completely under the roof in the roofed roll-off storage area; trash compactor; and tracking/transport of oil from the Oil Room.
2. A Storm Water Pollution Prevention Plan (SWP3) was available. You reported that it was in the process of being updated. According to the permit, the SWP3 was to be updated by July 1, 2012. A brief review of the current SWP3 indicated some deficiencies. For example, the site map did not show the location of the scrap metal roll-off overflow area, the trash compactor, the parts storage for the new process line, and arrows indicating the direction of flow for the drainage swales. The SWP3 included a form for the non-storm water discharge evaluation, but it was not completed. Documentation must include the date and location of evaluation, method used, list observed outfalls and onsite drainage points, observations, and any corrective actions.

Also, it appeared that the last employee training was August 15, 2011. The SWP3 must ensure that annual employee training occurs. *The missing information is a violation of Section 5 of the permit.* Please update the SWP3 within 30 days of the date on this letter. With your response to this letter, please provide a training schedule for your employees.

Details on the required contents of an SWP3 can be found in the current permit at: http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. A template for developing an SWP3, sample record keeping forms, and a sample Annual Report form for the MSGP can also be found at the above web page. I recommend reviewing the MSGP. Sections 1 through 7 pertain to all facilities. Section 8 Subpart F1 describes specific conditions and Best Management Practices (BMPs) required for your industry.

3. I did not observe any discharges during my inspection. The following types of discharge monitoring are required:
 - a. Quarterly Visual Assessment - A grab sample from each outfall (some exceptions are noted in the permit) must be taken each calendar quarter. Samples must be assessed for color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of pollution.
 - b. Benchmark Monitoring – From your facility's date of authorization to discharge, you have three years to collect four quarterly benchmark grab samples of your discharges. Each quarterly sample must represent a different quarter of the calendar year. Within 30 days of receipt of data from your lab, data must be submitted to Ohio EPA through the eDMR system. During Year 4, you must compare the average of your values against the benchmark value listed for your subsector in Section 8 of the permit. If the values exceed the benchmark, you must perform the actions under Section 6.2.1.2 of the permit.

For both types of monitoring, samples are to be collected within the first 30 minutes of discharge and on discharges that occur at least 72 hours from the previous discharge.

Discharge monitoring has been performed. Analytical sampling data from 3/15/2010 and 4/3/2012 was reviewed. Some issues were noted with the benchmark sampling. The sample point is near the roll-off storage area. This is the upstream end of the drainage system, near a drainage divide in the swale around the building's perimeter. This sampling point would not capture runoff from the trash compactor or tracking from the Oil Room. Sampling point(s) must be located to capture runoff from all areas where industrial activities or materials are exposed to precipitation. The samples are to be analyzed in accordance with 40 CFR 136 for Total Aluminum and Total Zinc (the parameters listed in Section 8 Subpart F1).

The 2012 samples were not analyzed for zinc and aluminum. Hardness data for the receiving stream also needs to be obtained and reported with your initial sampling results, which has not yet been done. *The sampling protocol must be revised within 30 days of the date on this letter to meet the requirements listed in Section 6 of the permit.* Videos showing how to perform sampling may be viewed at: http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. Additional sampling guidance can be found at: http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf.

While COD was not required for your facility, the reported COD value of 161 mg/l on April 11, 2012, appears rather high. For example, those industries required to report COD under the MSGP have a benchmark value of 120 mg/l. I recommend you review your sampling protocol and the facility for possible causes of high COD.

The NPDES permit requires that the SWP3 describe and ensure implementation of storm water controls. These controls must address several different components of facility operations that are listed in the permit. Storm water control implementation issues were noted for the following facility operations:

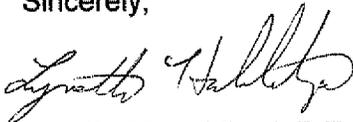
4. Minimize Exposure – The MSGP requires that you minimize exposure of manufacturing, processing, and material storage areas to precipitation by either locating industrial activities and materials inside or protecting them with a storm resistant covering. Steel Technologies has made significant effort to accomplish this. However, one of the roll-offs was only partially under the roofed storage area and the roll-off in the overflow area outside was uncovered. *This is violation of Section 2.1.2.1 of the permit.* Please be sure that roll-offs are placed completely under roof or provided a cover.

5. Good Housekeeping - This item requires BMPs that result in the maintenance of a clean, orderly facility. I observed oil product on the floor of the Oil Room. There was evidence of tracking through the bay door to the outside. Dark stains were also observed under the trash compactor. *This is a violation of Section Part 2.1.2.2 of the permit.* Better housekeeping is recommended in the Oil Room to minimize tracking of materials and near the trash compactor. The compactor must be a part of any routine maintenance inspection as well as a point to be assessed during quarterly routine inspections.

6. Erosion and Sediment Controls - There were areas of bare soil north of the building near shipping and west of the driveway to the Main Office. These areas must be stabilized. *The failure to stabilize exposed areas is a violation of Section 2.1.2.5 of the permit.*

Within 30 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the compliance issues. Your response should include the dates, either actual or proposed, for the completion of the actions. It must also include a written certification that an SWP3 has been updated. If there are any questions, please contact me at (419-373-3009) or lynette.hablitzel@epa.state.oh.us.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Section

/jlm

ec: Tracking