



**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.

The issue of flow measurement at outfall 601 has not been resolved as requested.

The SWPPP has been updated since my last inspection. I will review it in the near future and provide written comments at a later date.

Outfall Observations

Pictures were taken of the outfalls 010, 601, 011, 009, and 003 and of the treatment facilities and are attached for your reference. At the time of my inspection, the following visual observations were made:

- 010:** Flowing clear at the outlet of Johnsons Pond. Debris needs to be cleared from outlet pipe. It was suggested that the channel just upstream of the outlet be excavated.
- 601:** Appeared to be clear, but hard to determine due to extreme turbulence. It was explained that the flow meter is calibrated by temporarily diverting flow to the off line clarifier, which lowers the level of water at the outfall to where the bubbler can be seen. When the bubbler is seen to be producing at approximately two bubbles per second, the height of water is measured at the weir and compared to the ISCO flow meter inside the treatment building.
- 011:** Flow at approximately 5 to 10 gpm.
- 009:** Flowing at approximately 50 gpm. Visually clear.
- 003:** Flowing at approximately 75 to 100 gpm. At the time of the inspection, the discharge was extremely turbid and was discoloring the Nimishillen past the downstream dam. This is a violation of Ohio Administrative Code 3745-1-04; "Free from materials entering the waters as a result of human activity producing color, odor or other conditions in such a degree as to create a nuisance"

Compliance History

A review of Republic Engineered Products NPDES compliance history for the time period of April, 2010 thru June 2012 indicated the following:

Numeric Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	01094	Zinc, Total Recoverabl	30D Qty	0.94	1.7411	9/1/2010
601	01094	Zinc, Total Recoverabl	1D Qty	2.81	3.41823	9/15/2010
010	00552	Oil and Grease, Hexane	1D Conc	20	32.	2/9/2011
601	01094	Zinc, Total Recoverabl	30D Qty	0.94	1.07626	5/1/2011
010	00400	pH	1D Conc	9.0	9.42	11/2/2011
010	00400	pH	1D Conc	9.0	9.09	11/23/2011

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
010	00515	Residue, Total Dissolv	1/Quarter	1	0	08/01/2011

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

