



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

December 5, 2012

RE: MAHONING COUNTY
SEBRING LANDFILL
NPDES PERMIT NO. 3IN00351

Amsted Rail Co., Inc.
Attn: Robert Ribbing
1700 Walnut Street
Granit City, IL 62040
Sebring, OH 44672

Mr. Ribbing:

On November 6, 2012, this writer conducted an inspection of the Amsted Rail facility located at 20455 Lake Park Blvd. in Sebring. The site is a remediation project regulated by Ohio EPA. The project is intended to remove or secure hazardous material that was previously disposed on the site. The project is also intended to recover usable material such as chromite sand for reuse. Remediation was initiated on the north side of the property and migrated towards the south. A storm water retention basin was installed on the southern edge of the property to retain sediment runoff from approximately 80% of the site. As remediation efforts progressed towards the south, the basin and diversion ditches had to be relocated. The intent of the inspection was to evaluate the recent changes to the storm water control system. The compliance record for the facility was also reviewed as part of this Compliance Evaluation Inspection (CEI).

Observations

The following observations were made at the time of the inspection. Representing the facility during the inspection was Jim Krug.

1. The site remains disturbed as a result of the remediation project. Two depressions on the southern half of the site remain from excavation activities. It was understood sludge material is periodically pumped into the depressions. Other portions of the site drain directly into a sediment retention basin through a diversion trench. A large sump is located in the diversion ditch to control large sediment particles prior to the retention basin. Rock check dams are also located along the diversion ditch to control sediment migration. It was understood that as water accumulates in the two depressions, it is pumped to the sump rather than directly to the retention basin.
2. The sediment retention basin was recently relocated immediately adjacent to the previous basin. The outfall location is nearly identical to the old location. A rock check dam creates a forebay at the head of the basin and a rock check dam at the outfall controls the discharge of sediment. The retention basin was relocated in order to remediate the area of the previous basin. There were no concerns related to the retention basin.

3. The northern portion of the materials processing area flows into a small depression near the north entrance. No constructed outfall from the depression currently exists. It is understood that there is no discharge from the depression. As a result, there is no outfall established in the NPDES Permit for this location. This office must be notified in the event there are discharges from the depression. The discharge of material without first having a permitted outfall is a violation of Ohio Revised Code (R.C.) 6111.04
4. The northeastern corner of the remediation area drains into a depression on the east side of the north entrance. It is understood that storm water infiltrates into the ground through a subsurface slag deposit and that there is no surface discharge. There is also no outfall identified in the NPDES Permit for this location. The discharge of storm water from this site requires an outfall to be established in the NPDES Permit per R.C. 6111.04. The NPDES Permit must be modified in the event there is a potential for discharge from this location.
5. The western slope of the site is tributary to a diversion ditch that flows north to a roadside ditch on Lake Park Boulevard. The west slope is generally vegetated with phragmites and other plant material. This vegetation helps to stabilize the slope and to minimize the migration of sediment from the area. However, there was evidence that sand and other granular material is deposited on the sloped area. This material disturbs the established vegetation. This writer recommends that barriers such as concrete jersey barriers be placed along the top of the west bank to prevent material from cascading over the bank, and to protect the vegetation on the slope.
6. A discussion occurred regarding the long term plans for the site. This writer indicated that the final plans for the site will dictate any future Best Management Practices (BMPs) necessary to control sediment migration from the site. If the site is to be closed, re-graded and then seeded to establish a vegetated cover, temporary sediment control structures can be established while the vegetation is established. If the site is to have any ongoing activities, a revised Storm Water Pollution Prevention Plan (SWP3) must be developed that demonstrates drainage patterns and appropriate BMPs for the site. The NPDES Permit requires that the SWP3 be kept current as conditions change at the site. Since the site reclamation project is nearly completed, this office must be updated on the long-term plans for the site. A response to this inspection report must be submitted to this office no later than December 31, 2012, indicating the long-term plans for the site. In particular, the response must indicate if the site will be closed, graded and seeded; or, whether operations will continue to disturb the site. If continued disturbance of the site is planned following completion of the site remediation project, a date for submitting a revised SWP3 must be included in the response.

Compliance Review

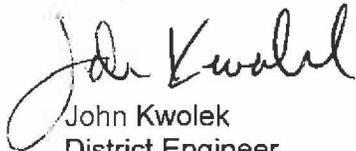
The compliance record for the Amsted Rail facility was reviewed as part of this inspection. The period of review was October 2011 through September 2012. One violation was reported during the review period.

| Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|---------|-----------|--------------|-------|----------------|----------------|
| December 2011 | 001 | TSS | 30-Day Conc. | 30 | 34. | 12/1/2011 |

SEBRING LANDFILL
DECEMBER 5, 2012
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You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection report.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cs

Cc. Curtis McDowell, Safety/Environmental Manager, Alliance Castings Co., LLC
John Alexander, Alexander Mill Services, Inc.,

Ec. Ed D'Amato, Ohio EPA, DMWM, NEDO