



**Environmental
Protection Agency**

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

February 26, 2013

RE: NATIONAL BRONZE & METALS, INC.
PERMIT NO. 3IN00316
LORAIN COUNTY

Mr. João C. F. Saraiva
General Manager
National Bronze & Metals, Inc.
5311 West River Road North
Lorain, Ohio 44055

Dear Mr. Saraiva:

On January 8, 2013, a meeting/inspection was conducted at the above referenced facility. The facility was represented by Ms. Stephanie DaDante, Quality Manager and you. The Ohio EPA Division of Surface Water was represented by Mr. Dean Stoll, Unit Supervisor and this writer. The purpose of the meeting/inspection was to discuss the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

The following items were discussed/observed:

1. A Copper Source Identification Plan for National Bronze & Metals, NBM, was submitted to this office on March 14, 2011.
2. Since this time, NBM has identified elevated levels of copper in the storm water both on the facility's property and from the west pipe, which originates from off the facility's property, and is routed to the facility's filtration pond.
3. NBM has reported that levels as high as 4453 ug/l have been detected coming from the west pipe.
4. You attended a meeting with the Sheffield Township Board of Trustees to discuss rerouting the west line to prevent the storm water from entering your facility's filtration pond.
5. You indicated that the Trustees did not approve the proposal.
6. This office committed to discuss this matter with the Sheffield Township Board of Trustees.
7. The interim table in the facility's NPDES permit for outfall 3IN00316001 expired on December 31, 2012. The final table in the facility's permit contains water quality based effluent limits for zinc total recoverable, lead total recoverable, cadmium total recoverable and copper total recoverable limits. These limits became effective January 1, 2013.
8. The filtration pond was empty at the time of the inspection.
9. Outfall 3IN00316001 was observed. No discharge was occurring.

10. A broken mold, sandy material, and a few chunks of bronze were observed on the ground near the old foundry. It was discussed that this could be a contributing factor to elevated concentrations of copper being found in the storm water sampled onsite. It was discussed that better housekeeping in this area may help reduce the elevated concentrations.
11. Building an overhang was discussed to prevent storm water from coming into contact with the dumpsters and miscellaneous items stored outdoors.
12. Potential drag out from the tow motor was also discussed as a potential source of the elevated copper levels.
13. This Office encourages NBM to continue to pursue the source of the elevated concentrations of copper found in the storm water within the facility's borders. Concurrently, the Agency will discuss the elevated concentrations of copper being discharged onto NBM's property via the storm sewer with the Sheffield Township Board of Trustees

This office has recently reviewed your self-monitoring reports covering the period December 1, 2010 through January 31, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01119	Copper, Total Recoverable	1D Conc	31	70.	1/3/2011
001	01119	Copper, Total Recoverable	1D Conc	31	131.	2/18/2011
001	01094	Zinc, Total Recoverable	1D Conc	250	355.	4/27/2011
001	01119	Copper, Total Recoverable	1D Conc	31	183.	4/27/2011
001	01094	Zinc, Total Recoverable	1D Conc	250	619.	1/17/2012
001	01119	Copper, Total Recoverable	1D Conc	31	510.	1/17/2012

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of surface Water

MWS/cs