



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

March 19, 2013

RE: TRUMBULL COUNTY
RMI TITANIUM COMPANY
OHIO EPA PERMIT NO. 3IC00026
NPDES PERMIT NO. OH0010863

Richard Mason, Director – Environmental Affairs
RTI International Metals, Inc.
1000 Warren Avenue
Niles, Ohio 44446

Mr. Mason:

Ohio EPA conducted a compliance evaluation inspection at the above-referenced facility on February 27, 2013. The inspection was performed to evaluate the operation and maintenance of the facility's treatment systems, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following observations and/or deficiencies were noted:

1. The overall operation and maintenance of the treatment works at Station 601 (internal sanitary package plant) appeared to be satisfactory. All treatment units appeared to be in working condition.
2. Please ensure that your operator is recording the following information in the O & M logbook: date, time in/out, initials, and description of work performed.
3. Ohio EPA understands that your wastewater operator, Mr. Dwane Stull, currently makes monthly visits to the wastewater treatment plant. Please note that upon renewal of the facility's NPDES permit, there will be new language requiring the designated operator to visit the plant a certain number of times per week. With an allotted sanitary flow of 37,500 gpd, the facility's wastewater plant is considered to be a class I facility. Class I plants require a certified operator to be on site at least 3 times a week for a minimum of 1.5 hours total.
4. During the inspection, Ohio EPA observed that several drums of titanium dioxide had leaked some of their contents onto the ground. While the drum area was contained, some of the free product was nearly overtopping the containment berms. Please ensure that this area is cleaned and maintained.
5. This office noted used oil containers being stored outside in uncontained areas (i.e., no berms or spill receptacles noted). The facility's Stormwater Pollution Prevention Plan (SWP3) indicates that areas of waste storage are equipped with secondary containment and spill absorption. Please address this matter so that waste materials are stored under roof, or are properly contained with absorption equipment available.

6. A number of uncovered scrap and debris storage containers were observed at the facility. Please ensure that inactive storage containers are kept covered or under roof.
7. The final polishing ponds at Station 001 had heavy amounts of floating oil and grease. However, it appears that the submerged outfall pipe was minimizing the amount of oil and grease being discharged to the Mahoning River.
8. The finally effluent at Station 001 appeared to be turbid, presumably due to the recent rainfall in the area.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period February 2012 – January 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IC00026*DD	March 2012	601	00530	Total Suspended Solids	30D Conc	30	44.8333	3/1/2012
3IC00026*DD	March 2012	601	00530	Total Suspended Solids	1D Conc	45	100.	3/14/2012
3IC00026*DD	June 2012	001	00550	Oil and Grease, Total	1D Conc	10	46.	6/13/2012
3IC00026*DD	June 2012	001	00550	Oil and Grease, Total	1D Qty	18.9	40.0453	6/13/2012
3IC00026*DD	January 2013	001	01094	Zinc, Total Recoverabl	30D Conc	95	119.	1/1/2013
3IC00026*DD	January 2013	001	01094	Zinc, Total Recoverabl	30D Qty	0.180	.18599	1/1/2013
3IC00026*DD	January 2013	001	00530	Total Suspended Solids	1D Conc	20.0	24.	1/2/2013

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3IC00026*DD	March 2012	801	00400	pH			AD	3/12/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/13/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/14/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/15/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/16/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/17/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/18/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/19/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/20/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/21/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/22/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/23/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/24/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/25/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/26/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/27/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/28/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/29/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/30/2012
3IC00026*DD	March 2012	801	00400	pH			AD	3/31/2012

The eDMR data review also indicated that a number of monitoring events in 2012 were missed and reported as "AH – staff not available". Please note that failure to report the required monitoring data is a violation of the terms and conditions of the NPDES permit.

Based on the results of the inspection and the data review, this office anticipates drafting and issuing a renewal NPDES permit. Once the new NPDES permit is drafted and issued, Ohio EPA advises that the permittee read through it carefully, as there will be a number of changes made to it. One such change is that the new permit will be phasing out fecal coliform monitoring limits at Outfall 001, and replacing them with *Escherichia coli* (*E. coli*) monitoring limits. The permittee will be given a one year conversion period to transition from meeting fecal coliform limits to meeting *E. coli* limits. Monitoring requirements for *E. coli*, and any other new parameters, will be described in the new permit.

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address all of the items identified in this letter. Your response shall include specific dates for initiation and completion of this action plan.

Should you have any questions or comments regarding this letter, please contact this office at (330)963-1120.

Respectfully,



Tomás Parry, P.E.
Environmental Engineer
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Eric March, RMI Titanium Company

