



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

April 2, 2013

RE: MAHONING COUNTY
SHERMAN INTERNATIONAL
NPDES PERMIT NO. 3ID00036
NOTICE OF VIOLATION

Mr. Om P. Sharma
Sherman International
367 Mansfield Avenue
Pittsburgh, PA 15220

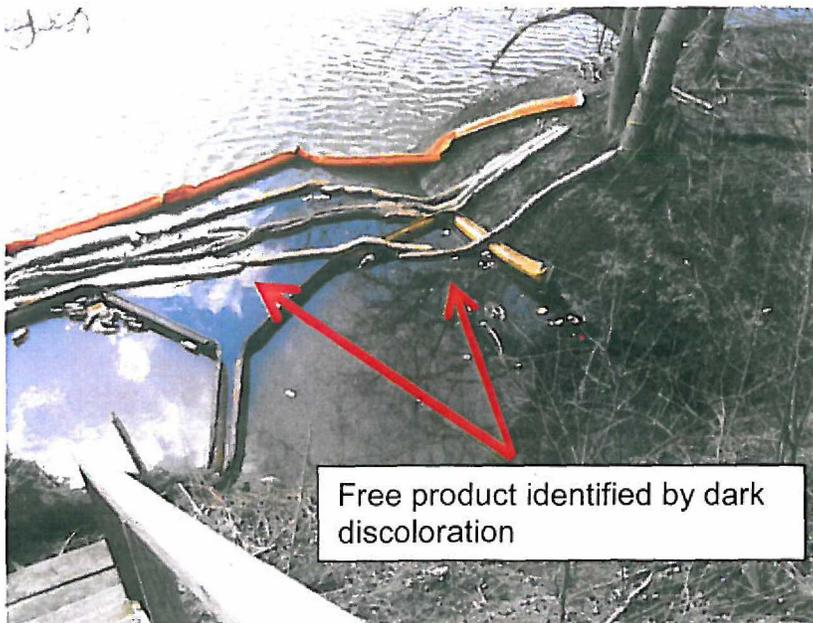
CERTIFIED MAIL

Mr. Sharma:

On March 14, 2013, this writer conducted an unannounced inspection of the Sherman International site in Campbell, OH. The intent of the inspection was to evaluate the groundwater recovery system. Outfall 007 was also inspected for the presence of free product.

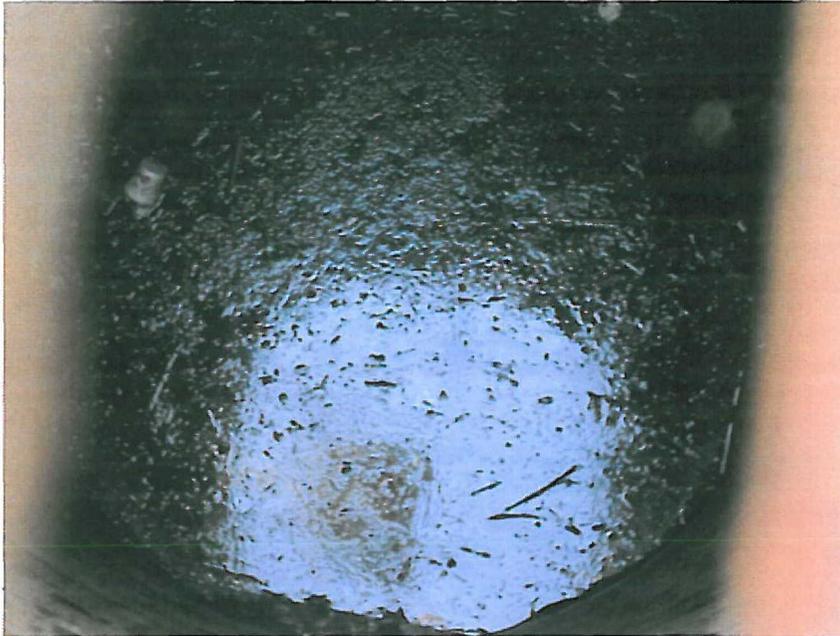
Following are observations made during the recent inspections:

- Free product was identified in the Mahoning River behind the booms. Free product was near discharging into the main channel of the Mahoning River during the inspection. A follow-up inspection by Ohio EPA on March 15, 2013, identified an oil sheen discharging into the Mahoning River from the containment area. Be advised that the discharge of free product to the Mahoning River is a violation of Ohio Revised Code (R.C.) 6111.04. In addition, Sherman International is potentially in violation of Ohio Administrative Code (OAC) 3745-1-04(B), (C) and/or (D).



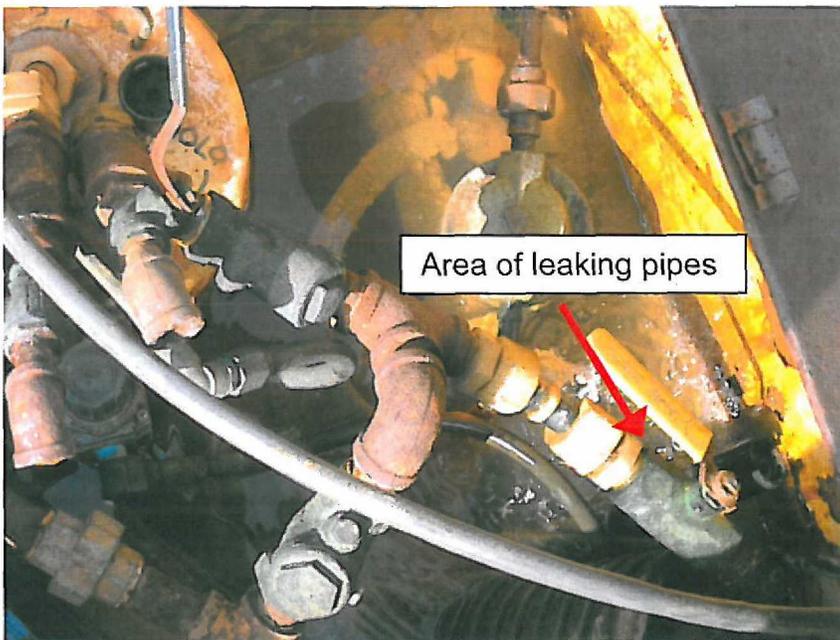
Photograph 1. Free product at Outfall 007 on March 14, 2013

- A heavy accumulation of free product was observed in the standpipe on March 14, 2013. It was the understanding of Ohio EPA that the standpipe would be inspected daily by Sherman International and that any residual oil would be removed in order to prevent the transport of free product to the river.



Photograph 2. Free product accumulated in the standpipe on March 14, 2013

- Pipes associated with Sump No. 1 were leaking and need to be repaired so that no groundwater or free product is discharged into the containment box.



Photograph 3. Leaking pipes in Sump 1 on March 14, 2013

Currently, the City of Campbell is implementing a plan to remediate the Sherman International site by removing the free product and relocating the storm sewer. However, that process could take several months to complete. In the interim, the following actions must be taken by Sherman International to ensure that free product does not discharge into the Mahoning River.

- a) Sherman International shall immediately start to monitor the standpipe on the storm sewer at least twice per day and operate the rope skimmer to continuously remove any free product from the storm sewer. If the rope skimmer is unable to keep the accumulation of free product in the storm sewer to no more than a slight sheen, Sherman International shall, on a daily basis, have the contents of the standpipe pumped and hauled offsite for proper treatment and disposal.
- b) All booms shall be maintained at the storm sewer outfall (Outfall 007) and no free product shall be permitted beyond the booms. The accumulation of free product behind the booms shall accumulate to no more than a slight sheen. All necessary actions shall be taken by Sherman International to prevent the discharge of free product to the Mahoning River beyond the booms established at the outfall. This requirement is in effect at all times including during precipitation events.
- c) A daily log of operations and maintenance shall be maintained at the facility at all times. The log shall include all daily observations of the river outfall and the standpipe. The volume of oil removed from the standpipe on a daily basis must be recorded in the log. All operations and maintenance activities shall be recorded in the daily log. The volume of free product hauled off site shall be recorded in the daily log on the day it is hauled. Pictures shall be taken of the outfall and standpipe on a daily basis. The daily log of operations and maintenance shall be stored inside the recovery building at the site, and the daily photos taken of the outfall and standpipe shall be provided to Ohio EPA upon request. All bills of lading for the shipment of free product shall be provided to the Ohio EPA, Northeast District Office, Division of Surface Water on a monthly basis.
- d) Provide Ohio EPA a key to access the property and the groundwater recovery building so that inspections of the system can occur at any time.

Finally, In a December letter to Sherman International, this office requested all records pertaining to the disposal of free product from the ground water recovery system. The period of record was to cover the years 2002 through the present. Copies of actual transport tickets, volumes transported, locations for disposal, invoices paid for transport and disposal, and any other records pertaining to the disposal of oil from the site must be provided. Copies of the records were to be provided with your response to the inspection report. In a January 29, 2013 response, Sherman committed to providing the requested information as soon as the information was located. To date this office has not received the requested information. Be advised that the requested information must be submitted to this office no later than April 19, 2013.

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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. A response to this inspection report must be provided no later than April 19, 2013.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/cs

- Cc. Krishna Sharma, Chairperson, Sherman International Corporation
Katie Courtright, Brownfield Specialist
- Ec. Sue Watkins, Ohio EPA, DERR, NEDO
Reggie Brown, Ohio EPA, DERR, NEDO
Kurt Kollar, Ohio EPA, DERR, NEDO