



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

May 24, 2013

RE: FALCON FOUNDRY  
3DP00050\*BP  
LOWELLVILLE  
MAHONING COUNTY

Gary Slaven  
President  
Falcon Foundry  
96 6<sup>th</sup> Street  
Lowellville, Ohio 44436

Dear Mr. Slaven:

On May 9, 2013, this office conducted an inspection of Falcon Foundry. John Kwolek and Donna Kniss represented the Ohio EPA. Falcon Foundry was represented by Gary Slaven, Bill Slaven, Mike Vignola, and other representatives; no attendance list was provided. The storm water issues will be addressed in separate correspondence. The purpose of this letter is to address issues associated with Falcon Foundry's discharge to the sanitary sewer system.

A review of the discharge monitoring report (DMR) data received by Ohio EPA showed that Falcon Foundry has not submitted sampling results since March 19, 2012. Mr. Vignola indicated that he has been searching for 2012 and early 2013 data; while plant personnel recalled that samples were collected, he has yet to locate any data. Falcon Foundry collected samples for the first quarter of 2013. By June 30, 2013, Falcon Foundry should submit revised eDMR's with any located data, and send written correspondence to this office identifying the remaining missing data.

The Indirect Discharge Permit (IDP) states that samples shall be collected from the pretreatment system effluent tank while the pretreatment system is discharging. Falcon is in the process of identifying all sanitary and storm sewer systems on the Falcon property, including sewer lines inside and outside the building. There are two manholes in front of the building, and there was extensive discussion/speculation on that sewer line and potential laterals into the building.

The IDP permit limits are based on Lowellville local limits, and the sample location presumes that all contaminated wastewaters pass through the pretreatment system. Because of the unknowns about the sewer lines, that may not be the case. Falcon must confirm that wastewater discharging directly to the sanitary sewer system does not contain excessive pollutants that would require pretreatment.

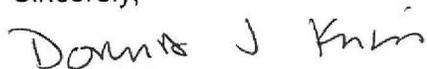
Falcon Foundry personnel must collect samples from the pretreatment system and the sewer downstream of all Falcon discharges to determine if there are other sources of contaminated wastewater. The two manholes may be part of the Lowellville sanitary sewer system, and receive wastewater from other facilities. If this is the case, Falcon must collect samples upstream from all Falcon discharges to characterize the wastewater before Falcon wastewater

is added. All samples should be timed to account for travel time in the collection system. They should also be timed to account for Falcon operations, including shift change showers. More than one sample event may be needed to characterize the wastewater discharge characteristics.

By July 19, 2013, Falcon Foundry must submit a report to Ohio EPA containing a map of the sample locations, a discussion of the sampling protocols and the sample results. During the meeting, Falcon committed to beginning sampling starting May 17, 2013. If the initial results indicate the need for additional or more comprehensive sampling, the report submittal date can be delayed.

If you have any questions or comments, please contact me at (330)963-1285. I can also be reached via e-mail at [donna.kniss@epa.ohio.gov](mailto:donna.kniss@epa.ohio.gov).

Sincerely,



Donna J. Kniss  
District Engineer  
Division of Surface Water

DJK/cs

cc Mike Vignola  
Ryan Laake, Ohio EPA, CO, DSW

ec John Kwolek, Ohio EPA, NEDO, DSW

File/Pretreatment Industrial User/Permit-Compliance