



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

July 10, 2013

RE: PSC METALS INC.
3GR00866*DG
STORMWATER
STARK COUNTY

Steve Forystek
Director HSET
PSC Metals Inc.
5875 Landerbrook Dr.
Mayfield Heights, OH 44124

Dear Mr. Forystek:

On June 13, 2013, this writer conducted an inspection of your facility, located at 3101 Varley Avenue SW, Canton, Stark County. The purpose of the inspection was to observe the completed removal of the infiltration trench and the installation of the concrete covered turnings pad. I was accompanied by Mr. Dave Mefford, PSC Metals, Inc. The following is a summary of the items we discussed.

The trench has been backfilled completely with the new storm sewer installed as per the approved PTI. Mr. Mefford indicated that a summary report (dated June 3, 2013) on the infiltration trench removal by Flynn Environmental had been sent in to this office. After checking our records I could not find this report. Please send another copy as soon as possible for our review and records. I told Mr. Mefford that the oil/water separator could be put back on line.

The catch basin located on the western part of the property at the base of the hill needs to be investigated further. During the inspection it was learned that a pipe outlets to the north and eventually to the railroad ditch between PSC and Timken. Reportedly, this pipe does not show up on any storm sewer maps currently in possession of PSC. I relayed to Mr. Mefford that additional efforts should be made to find historical storm sewer maps for the western part of the property that may show this pipe. We are also interested in knowing if there are any inlet pipes to the aforementioned catch basin that would contribute drainage off the property. If there were no maps available then a physical investigation must be initiated to determine whether or not there are any inlet pipes.

We also discussed the applicability of benchmark sampling if there was no discharge from a regulated area of the site. Looking at the definition of discharge in the Industrial General Storm Water Permit, it is clear that there must be a discharge to waters of the State. You must be very careful in making this determination at your site. I have stated in the past that I agree with your assertion that there is no discharge to waters of the State at the east end of the property. However, the pipe we found during the inspection on the west side indicates that PSC cannot state that there are no discharges of storm water to waters of the State. If the catch basin receives surface runoff from the adjacent roadway and this roadway is used to transport waste or raw material, then the benchmark sampling would apply. If any area of the site contains buried waste, scattered surface waste/recyclable product where sheet flow runoff could enter waters of the State, then it would also be subject to benchmark monitoring. With this in mind, you are strongly encouraged to re-evaluate the site utilized by PSC to identify the location of all scattered surface waste/recyclable product where sheet flow runoff could enter waters of the State from these areas. Also, a thorough investigation must be undertaken to identify any and all conveyances from pipes, ditches, swales, sheet flow to waters of the State and added to the current storm water map for the site. Only after this has been completed can PSC determine whether or not benchmark sampling is applicable. This investigation should be completed as soon as possible due to the requirements stipulated in the permit to gather four quarters of data.

Mr. Mefford inquired as to what hardness value should be used if benchmark sampling was to be conducted. The value can be obtained in a number of ways that is spelled out in the permit. One is using available data gathered from sampling performed by this office. A review of our historical data for Hurford Run Mouth (closest site) indicated an average value of 431 mg/l would be appropriate.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136 or by email phil.rhodes@epa.ohio.gov.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR:ddw

File: Industrial Stormwater