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July 18, 2013

Harry Gulley, HSE Manager
Aleris Rolled Products Inc.
1 Reynolds Road
Ashville, OH 43103

Re: Aleris Rolled Products Inc
NPDES Permit 4IC00002/ OH0003891
Compliance Evaluation Inspection
Pickaway County

Dear Mr. Gulley:

On July 16, 2013, a Compliance Evaluation Inspection was conducted at the Aleris Rolled Products Inc. Present for the inspection were Harry Gulley and Eric Kellough representing Aleris Rolled Products, Inc. and myself of the Ohio EPA, Central District Office, Division of Surface Water.

The purpose of the inspection was to evaluate compliance with the terms and conditions of your NPDES permit and to evaluate the operation and maintenance of the plant. Please consult the attached inspection report for comments on the inspection. If you have any questions or comments concerning the enclosed inspection report, please contact me at (614) 728-3854 or e-mail at paul.vandermeer@epa.state.oh.us.

Sincerely

Paul L. Vandermeer
Environmental Specialist II
Compliance and Enforcement Unit
Division of Surface Water
Central District Office

cc: File Copy

ec: Paul L. Vandermeer

PV/slw Aleris_2013

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
4IC00002	OH0003891	CEI	S	2
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/16/2013	8:00 am	9:05 am	No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Aleris Rolled Products Inc. 1 Reynolds Road Ashville, OH 43103	7/1/2011
	Permit Expiration Date
	3/31/2015
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Eric Kellough, WWTP Operator	740-983-1360
Name and Title of Responsible Official	Phone Number
Harry Gulley, HSE Manager	740-983-1332

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
S*	Operations & Maintenance	
S	Facility Site Review	
N	Collection System	
S	Flow Measurement	
N	Receiving Waters	
S	Laboratory	*Both D.O. and pH probes calibrated before each use. PACE Analytical performs all other analyses.*

Comments: **Process wastewater is treated via ultrafiltration prior to discharge into the package WWTP. Aleris will be examining all their treatment processes to discover the reasons for the presence of effluent toxicity for Ceriodaphnia as discovered during a bioassay performed by Ohio EPA. A consultant will be performing this evaluation and making recommendations to Aleris.*

Signatures	
7/19/13	7/17/13
Paul L. Vandermeer, Inspector Date Compliance & Enforcement Division of Surface Water Central District Office	Erin Sherer, Reviewer Date Compliance & Enforcement Supervisor Division of Surface Water Central District Office

Compliance Data for Aleris Rolled Products Inc. between 8/1/2012 to 7/1/2013

Summary
Permit Effluent Limit Violations: 1
Permit Effluent Code Violations: 0
Permit Effluent Frequency Violations: 0
Compliance Schedule Milestones Not Entered: 0

Limit Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2012	001	Total Suspended Solids	30D Conc	30	32.	9/1/2012

SECTION D: PERMIT VERIFICATION

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters ..... Y
(c) Products and production rates conform with permit application ..... Y
(d) Flows and loadings conform with NPDES permit ..... Y
(e) Treatment processes are as described in permit application ..... Y
(f) New treatment process added since last inspection ..... Y*
(g) Notification given to State of new, different or increased discharges ..... NA
(h) All discharges are permitted ..... Y
(i) Number and location of discharge points are as described in permit ..... Y

Comments: **Ultrafiltration installed for process waste stream prior to addition to the sanitary waste stream. PTI was processed and approved by our office.*

SECTION E: COMPLIANCE

(a) Any significant violations since the last inspection ..... N
(b) Permittee is taking actions to resolve violations ..... NA
(c) Permittee has a compliance schedule ..... N
(d) Permittee is meeting compliance schedule ..... NA

Comments: *Whole effluent toxicity will be evaluated during the study performed by a consultant. Aleris will inform Ohio EPA of the conclusions drawn by the study.*

KEY: Y – Yes, N – No, NA – Not Applicable, NE – Not Evaluated, * Further comment included in attachment

SECTION F: OPERATION AND MAINTENANCE

(a) Standby power available ..... Y
If yes, what type? *Portable generator available*
(b) Adequate alarm system available for power or equipment failures ..... Y
(c) All treatment units in service other than backup units ..... Y
(d) Wastewater Treatment Works classification ..... A
(e) Operator of Record holds unexpired license of class required by Permit.. Y
Class held: A
(f) Copy of certificate of Operator of Record displayed on-site ..... Y
(g) Minimum operator staffing requirements fulfilled ..... Y
(h) Routine and preventative maintenance scheduled and performed ..... Y
(i) Any major equipment breakdown since last inspection ..... N
(j) Operation and maintenance manual provided and maintained ..... Y
(k) Any plant bypasses since last inspection ..... N
(l) Regulatory agency notified of bypasses ..... NA
By MOR ☐ and/or Spill Hotline (1-800-282-9378) ☐
(m) Any hydraulic or organic overloads since last inspection ..... N

Comments:

SECTION G: RECORD KEEPING

a) Log book provided ..... Y
b) Format of log book ..... computer
c) Log book(s) kept onsite in an area protected from weather ..... NA
d) Log book contains the following:
i) Identification of treatment works ..... NA
ii) Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7 ..... Y*
iii) Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs) ..... Y^
iv) Laboratory results (unless documented on bench sheets) ..... bench
v) Identification of person making log entries ..... NA^
e) Has the Operator of Record submitted written notification to the permittee, Ohio EPA and any applicable local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred? ... Y

Comments: **Timecard system. Employees present 8 hours per day, 5 days per week, well exceeding the minimum requirements. ^Work order system.*

SECTION H: COLLECTION SYSTEM

a) Percent comb[illegible]
b) Any coll[illegible] flows sinc[illegible] ction
CSO ☐ [illegible] ☐
c) Regulatory agency notified of overflows
d) CSO O&M plan provided and implemented
e) CSOs monitored and reported in accordance with permit
f) Portable pumps are used to relieve system
g) Lift [illegible]
h) [illegible] ment
i) Is [illegible] were there any major repairs to collection system since last inspection
j) Any complaints received since last inspection of basement flooding
k) Are any portions of the sewer system at or near capacity
l) Are operations changed during high-flow events?

Comments: *Section not applicable.*

SECTION I: SLUDGE MANAGEMENT

a) Sludge adequately disposed ..... Y
Method: *Landfilled*
b) If sludge is incinerated, where is ash disposed of ..... NA
c) Is sludge disposal contracted ..... Y*
Name: *Metropolitan Hauling*
d) Has amount of sludge generated changed significantly ..... N
e) Adequate sludge storage provided at plant ..... Y
f) Records kept in accordance with State and Federal law ..... Y
g) Any complaints received last year regarding sludge ..... NA
h) Is sludge adequately processed (digestion, pathogen control) ..... NA

Comments: **Sludge cake is generated from process waste ultrafiltration. This is loaded into a rolloff container and landfilled. WWTP biosolids are wasted from the clarifier into a portable plastic tank and landfilled.*

SECTION J: SELF-MONITORING PROGRAM

a) Primary flow measuring device operated and maintained ..... Y
Type of device: *Magmeter* Device location: *Effluent pipe*
b) Calibration frequency adequate ..... Y*
Date of last calibration: *8/9/12*
c) Secondary instruments operated and maintained ..... NA
d) Flow measurements equipment adequate to handle full range of flows.... Y
e) Actual flow discharged is measured ..... Y

f) Flow measuring equipment inspection frequency ..... daily
g) Sampling location(s) are as specified by permit..... Y
h) Parameters and sampling frequency agree with permit..... Y
i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments: *Aleris shall send an invoice or other proof of calibration to Paul Vandermeer via e-mail on or before August 9. 2013.*

SECTION K: Laboratory

a) EPA applicable analytical testing procedures used (40 CFR 136.3)..... Y
b) If alternate procedures are used, are they properly approved? ..... NA
c) Analysis performed more frequency ..... N
   If yes, are results recorded in permittee's report? ..... Y
d) Commercial laboratory used:
   Name: *PACE Analytical*
   Parameters analyzed: *All but D.O., pH, and temperature*
e) Quality assurance manual provided and maintained ..... Y
f) Calibration and maintenance of instruments is satisfactory? ..... Y

Comments:

SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Outfall sign in place	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	NE	none	none	none	none	none	clear	

Comments:

SECTION M: MULTIMEDIA OBSERVATIONS

a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... N
b) Do you notice staining or discoloration of soils, pavement or floors..... N
c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
e) Do you notice any unusual odors or strong chemical smells ..... N
f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

1) What is the cause of the condition?
2) Is the observed condition or source a waste product?
3) Where is the suspected contaminant normally disposed?
4) Is this disposal permitted?
5) How long has the condition existed and when did it begin?

Comments: