



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

August 8, 2013

RE: LORAIN COUNTY
CITY OF ELYRIA
INDUSTRIAL STORM WATER
BLUE STAR METAL RECYCLING
3GR00735*EG

NOTICE OF VIOLATION

Bill Ivancic, Vice President
Blue Star Metal Recycling
201 Williams Street
Elyria, Ohio 44035

Dear Mr. Ivancic:

On August 5, 2013, Ohio EPA conducted an inspection at the Blue Star Metal Recycling facility located at 201 Williams Street. Our inspection's purpose was to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activity #OH000005. The site's industrial activities are categorized by the Standard Industrial Classification (SIC) Code 5093: Scrap Recycling & Waste Recycling Facility except Source-Separated Recycling. This corresponds to Subsector N1 in Part 8 of the NPDES permit. During the inspection, you represented Blue Star Metal Recycling. I represented the Ohio EPA.

Storm Water Pollution Prevention Plan (SWPPP)

The facility currently has coverage under the Ohio EPA General NPDES Permit 3GR00735*EG. Our records show that the permit for your facility was issued April 1, 2012. Part 5 of the NPDES Permit requires one to create and implement a Storm Water Pollution Prevention Plan (SWPPP). During the inspection, your facilities' SWPPP was reviewed. While the facility did have a SWPPP present, it is important to make sure that all necessary parts that are listed in Part 5 of the NPDES Permit are included and followed throughout the site. Failure to do so will result in violations against the NPDES Permit.

Storm Water Outfalls

The Notice of Intent (NOI) submitted by Blue Star Metal Recycling to renew coverage and the Site Map indicate that there are only two outfalls from this facility. However, our site inspection indicates that there are eight outfalls from the site. One outfall being the sheet flow off the main entrance of the lot (**Figure 9**), two being the flow from the exit of the drive thru recycling drop off garage (**Figure 3**), three is the sheet flow off the east side over the gravel berm (**Figure 1**), four is the water that collects in the oil water separator (**Figure 2**), five is the storm drain at the weigh in station (**Figure 4**), the sixth is the roof drains that discharge into the street (**Figure 6**), outfall seven is the drain under the can crusher inside the drive thru recycling garage (**Figure 7**), and the eighth outfall is the flow off of the back of the lot by the train tracks that flows into the oil water separator (**Figure 5**). To your understanding the flow went through the oil water outfalls then discharged into the storm sewers. If this is true then it, along with the other oil water separator on the east side should be counted as on

BILL IVANCIC
AUGUST 8, 2013
PAGE 2

outfall. All outfalls must be identified on the NOI. To correct this error, please either submit a revised NOI or letter to our Central Office acknowledging the additional 6 outfalls. For each outfall, identify the SIC and subsector codes associated with the outfall as well as the latitude and longitude. There are no federal effluent limitations for storm water discharges from this facility. The revised NOI or letter should be sent **within 14 days** of this letter to:

Jason Fyffe
Ohio EPA Division of Surface Water
P.O. Box 1049
Columbus, OH 43216-1049

The NOI can be found on our website at:

http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

While it appears that water is discharging at more spots of the site than what was recorded, many of these outfalls can be eliminated by building or renovating those areas to not allow water to discharge. If these newly identified outfalls are eliminated, then they would not need to be recorded.

Monitoring, Recordkeeping and Reporting

Ohio EPA reviewed recordkeeping associated with required site inspections and storm water monitoring. Our inspection revealed the following violations of the NPDES permit:

Failure to report the annual Comprehensive Site Inspection on required EPA form. This is a violation of Part 4.3.2 and 7.2 of the NPDES permit. Blue Star Metal Recycling is to utilize the Annual Report form located in Appendix I of the NPDES permit and keep a copy of the report with the SWPPP. The report is to be made available to Ohio EPA upon request. A Comprehensive Site Inspection and Annual Report must be completed by March 31, 2014, for the current reporting year.

In addition to these violations, Ohio EPA noted the following:

- Blue Star Metal Recycling has not conducted any benchmark monitoring to date. Please note that at least four benchmark samples must be taken before the end of Year 3 of the NPDES permit, i.e., December 31, 2014. At least one benchmark sampling must be taken during each of the quarterly monitoring periods stipulated in Part 6.1.7 of the NPDES permit. For parameters that are hardness-dependent, please refer to Appendix J for how to determine the hardness value of the receiving stream. Results of benchmark monitoring must be reported to Ohio EPA within 30 days of receiving results from the lab. Results must be reported using Ohio EPA's e-DMR system. Information on setting up an account is available at www.epa.ohio.gov/dsw/edmr/eDMR.aspx.
- It was also discussed that it might be easier to use the inspection form templates supplied by the EPA for the Routine Facility Inspections and Quarterly Visual Assessments. These forms can be found at the following page under the "Sample Recording Template" link:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

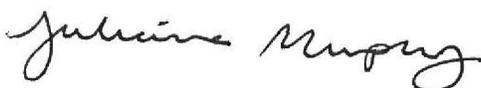
Site Inspection

1. The dumpsters on site were uncovered and damaged. This allows for storm water to get into the containers and leave the through the cracks with the pollutants. All dumpsters on site must be kept under a type of covering; tarp, lid, roof, etc., to prevent this contamination. **(See Figure 9)**
2. There were multiple areas on the site where oil stains were observed. This could be a result of the cars not being fully drained and leaking while sitting in site, the car parts that are not properly stored were leaking, or spills during the dismantling process. To prevent this from happening in the future, make sure that cars get drained upon arrival, car parts are properly stored, and dismantling happens in the designated area. These spills should be cleaned up immediately and disposed of properly. **(See Fig 8 & 10)**
3. There were multiple piles of metal turnings all over the site. These turnings needs to be cleaned up immediately and kept within some type of containment. Not following this is a violation of Part 8.N.3.1.3 of the NPDES Permit. **(See Fig 11, 13, 17, & 19)**
4. Good housekeeping and/or more effective Best Management Practices (BMPs) need to be implemented and achieved throughout the site. There were uncontained stock piles of rusted car parts, broken pallets, metal scrap, rotors, and other debris throughout the site. **(See Fig 8, 12, 14, 16, & 18)**
5. Car batteries can be a possible pollutant. It is strongly suggested to keep then in a contain area in case of a spill. The cardboard boxes that were used to store the other parts in the drive thru recycling garage are acceptable. **(See Fig 20)**

Please provide this office with a letter of response no later than **August 21, 2013**, indicating the actions you will take to address the concerns and violations noted above.

If you should have any questions concerning this letter, feel free to contact Dan Bogoevski at (330) 963-1145 or by e-mail at Dan.Bogoevski@epa.ohio.gov.

Sincerely,



Julianna Murphy
Assistant to the District Engineer
Division of Surface Water

JM:bo

ec: Dan Bogoevski, DSW, NEDO
Jason Fyffe, DSW, CO

BLUE STAR METAL RECYCLING
Elyria Lorain County

Photos Taken: August 5, 2013
By: Juliana Murphy, DSW, NEDO



Figure 1: (Top Left) Out fall off of the east side of the lot where water sheet flows off site. Some goes directly into the street and a percentage into the oil water separator north of the gate.

Figure 2: (Middle Left) Oil water separator north of Figure 1.

Figure 3: (Bottom Left) Exit for the drive thru recycling building.

Figure 4: (Top Right) Drain in from on the weigh in station.

Figure 5: (Bottom Right) Second oil water separator on the north side of the lot by the rail road.





Figure 6: (Top Left) Roof Drain outfalls to the east onto the street.

Figure 7: (Middle Left) Drain inside the drive thru recycling

Figure 8: (Bottom Left) Oil spills on site.

Figure 9: (Top Right) Uncovered dumpsters at the main entrance. Also shows where lot sheet flows off onto Williams Street.

Figure 10: (Bottom Right) Oil spills on site.





Figure 11: *(Top Left \)* Turning on the ground by the railroad tracks.
Figure 12: *(Middle Left)* Piles of broken up wood pallets found around the site.
Figure 13: *(Bottom Left)* Pill of turnings by the rail road tracks.
Figure 14: *(Top Right)* Piles of rusted scrap on the north side of the site by the railroad tracks.
Figure 15: *(Bottom Right)* Car parts lying around the site.





Figure 16: *(Top Left)* Stock pile of uncontained car parts.
Figure 17: *(Middle Left)* Stock piles of uncontained turnings.
Figure 18: *(Bottom Left)* Stock pile of rotors.
Figure 19: *(Top Right)* Stock pile of uncontained turnings.
Figure 20: *(Bottom Right)* Car batteries in the recycling drive thru.

