



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

August 28, 2013

RE: PTC ALLIANCE
 PERMIT NO: 3ID00043
 INDUSTRIAL P/C
 STARK COUNTY

Jim Carrell
 DOM Division Safety Manager
 PTC Alliance
 640 Keystone Street
 Alliance, OH 44601

Dear Mr. Carrell:

On August 29, 2013, this writer conducted a compliance evaluation inspection of your facility. We reviewed the operations of the SRM Mill and the Rush Street Mill as it relates to generating wastewater. Industrial wastewater is still being treated via your waste treatment system. All treated wastewater that would have been discharged at outfall 602 is being discharged to the City of Alliance Wastewater Treatment Plant (WWTP). Reportedly, the only direct discharge from your facility is non-contact cooling water at outfall 001 and stormwater at outfalls 001 and 002.

A review of your compliance history as identified by our Surface Water Information Management System (SWIMS) tracking system for the time period of January 2010 through July 2013 revealed the following violations of your National Pollutant Discharge Elimination System (NPDES) permit:

Numeric Violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Oil and Grease, Hexane	1D Conc	10	118.	2/2/2010
001	Oil and Grease, Hexane	1D Conc	10	36.	2/22/2010
001	Oil and Grease, Hexane	1D Conc	10	44.	3/1/2010
001	Oil and Grease, Hexane	1D Conc	10	20.	4/6/2010
001	Oil and Grease, Hexane	1D Conc	10	18.	6/23/2010
002	Zinc, Total Recoverabl	1D Conc	330	1310.	11/17/2010
001	Oil and Grease, Hexane	1D Conc	10	22.	12/7/2010
001	Oil and Grease, Hexane	1D Conc	10	23.	12/21/2010
001	Oil and Grease, Hexane	1D Conc	10	19.	5/2/2011
002	Total Suspended Solids	1D Conc	45	96.	11/22/2011
002	Total Suspended Solids	30D Conc	30	34.75	11/1/2011
001	Oil and Grease, Hexane	1D Conc	10	12.	2/2/2012
001	Oil and Grease, Hexane	1D Conc	10	28.	4/4/2012
001	Oil and Grease, Hexane	1D Conc	10	35.	5/1/2012
001	Oil and Grease, Hexane	1D Conc	10	100.	6/4/2012

001	Oil and Grease, Hexane	1D Conc	10	509.	6/18/2012
001	Oil and Grease, Hexane	1D Conc	10	63.	7/24/2012
001	Oil and Grease, Hexane	1D Conc	10	60.	8/29/2012
002	pH	1D Conc	6.5	6.47	10/16/2012
002	pH	1D Conc	6.5	6.1	3/26/2013
001	pH	1D Conc	6.5	6.04	4/3/2013
002	pH	1D Conc	6.5	6.08	4/3/2013
002	pH	1D Conc	6.5	6.02	4/9/2013
002	pH	1D Conc	6.5	6.06	4/16/2013

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
002	pH	1/Week	1	0	03/08/2012
002	pH	1/Week	1	0	03/15/2012
002	pH	1/Week	1	0	03/22/2012
001	Flow Rate	1/Day	1	0	12/14/2010
001	Flow Rate	1/Day	1	0	12/15/2010
001	Flow Rate	1/Day	1	0	12/16/2010
001	Flow Rate	1/Day	1	0	12/17/2010
001	Flow Rate	1/Day	1	0	12/18/2010
001	Flow Rate	1/Day	1	0	12/19/2010
001	Flow Rate	1/Day	1	0	12/20/2010
001	Flow Rate	1/Day	1	0	12/21/2010
001	Flow Rate	1/Day	1	0	12/22/2010
001	Flow Rate	1/Day	1	0	12/23/2010
001	Flow Rate	1/Day	1	0	12/24/2010
001	Flow Rate	1/Day	1	0	12/25/2010
001	Flow Rate	1/Day	1	0	12/26/2010
001	Flow Rate	1/Day	1	0	12/27/2010
001	Flow Rate	1/Day	1	0	12/28/2010
001	Flow Rate	1/Day	1	0	12/29/2010
001	Flow Rate	1/Day	1	0	12/30/2010
001	Flow Rate	1/Day	1	0	12/31/2010
002	Total Suspended Solids	1/Week	1	0	12/22/2010
002	Nitrogen, Ammonia (NH3)	1/Week	1	0	12/22/2010
002	pH	1/Week	1	0	12/22/2010
002	Zinc, Total Recoverabl	1/Week	1	0	12/22/2010
002	Copper, Total Recovers	1/Week	1	0	12/22/2010
002	Residue, Total Dissolv	1/Week	1	0	12/22/2010
002	Cyanide, Free	1/Week	1	0	12/22/2010

During the inspection you showed me the storm sewer that was found to be causing the Oil/Grease violations at outfall 001 listed above. A concrete below grade vault was discovered as the source of the oil when a video camera was run up the piping that was connected to 001. The vault is underneath the RP drip pad located near the 5 mill entry area. It has been isolated from the storm sewer by sealing off the pipe coming from the vault at a point where you could access the sewer. The vault itself has not been accessed from above for evaluation as it is an

area of active pipe storage. We request that you submit a summary of the investigation detailing the location of the piping that was videoed, the location where the pipe conveying the oil was sealed, the location of the vault, and the reason for the vaults existence. While the oil problem at outfall 001 appears to be solved, we encourage PTC Alliance to further investigate this vault to evaluate its integrity and the need for its existence.

The pH meter is now calibrated monthly using 4, 7, and 10 buffers. There has not been a pH violation since April 2013. While treated process wastewater is being discharged to the sanitary sewer, there is still flow from outfall 002. It is thought to be ground water infiltrating into the storm sewer but there may be a connection of non-process waters coming from the Clayton Steam Generator. A review of your flow monitoring records at outfall 002 indicates for 2013 that the flow has ranged from 1000 to 19,000 gpd. Stormwater could very well be the source of the higher flows during precipitation events. However, there seems to be a consistent background flow that needs to be investigated and the source determined.

The access road thru the main gate back into the plant area was covered with an excessive amount of dirt. The Stormwater Pollution Prevention Plan (SWPPP) should be revised (last updated in 2011) to address this area with an increase in routine inspections and street sweeping when necessary.

A steel shot air pollution control device was observed directly adjacent to an open storm grate. A picture is attached for your reference. A shroud should be placed at least on the same side as the storm grate to ensure shot does not enter the storm system.

I hope this is an accurate account of the inspection. If you should have any questions, feel free to contact this writer at (330) 963-1136 or by e-mail at phil.rhodes@epa.ohio.gov.

Sincerely,



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

PPR/cs

File/Industrial/Permit/Compliance