



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 28, 2011

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

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

Dear Mr. Forystek:

On November 22, 2011, this writer conducted an inspection of your facility, located at 3101 Varley Avenue SW, Canton, Stark County. The purpose of the inspection was to determine compliance with your Industrial General Storm Water (NPDES) permit referenced above. Besides you, in attendance were Virginia Wilson, Ohio EPA, DSW, NEDO and Mr. Dave Mefford, PSC Metals Inc. Below you will find a summary of the inspection:

General

PSC Metals Inc. processes various sources of scrap ferrous and non-ferrous metals for recycle. The sources are numerous but consist mainly of automobiles, appliances, bushings (metal stampings), sheet metal, metal turnings, and general scrap from industry and the public sector. Your SIC Code is 5093. The majority of the scrap processed is sold to the Timken Company and transported to their scrap yard located directly north of your facility. The site is approximately 100 acres in size, long and narrow in shape and parallels existing rail lines.

All scrap metal coming into the site goes thru the scale and radiation detectors. Automobiles are processed thru a fairly new shredder installed in 2005. Auto's arriving at the site can arrive already processed with all fluids and the battery removed (crushed or uncrushed) or whole. If they are whole, PSC can process (remove fluids and battery) them on site before running them thru the shredder. If batteries are received they are immediately stored inside a dedicated building on pallets before being shipped off-site for recycle. Autos are also checked for switches containing mercury. If found they are pulled from the vehicle, stored in sealed containers and shipped off-site for recycle. The shredder separates the metal from the fluff consisting of lightweight material such as foam from seats and dashboards, plastics and rubber. Fluff is accumulated temporarily on-site until it can be shipped to a properly licensed landfill.

Appliances are offloaded and verified for refrigerant removal certification prior to processing thru the shredder. Appliances without certifications and thought to contain refrigerants are set aside to await an outside contractor to come in and recover the refrigerants.

Also operating on the site is a shearer used to take large pieces of scrap metal plate and reduce it down to a manageable size for processing thru the shredder.

Stormwater Pollution Prevention Plan (SWPPP)

A SWPPP was presented for our review during our pre-meeting and a basic cursory review performed. You were requested to submit a copy of the SWPPP for thorough review. The following observations were made concerning the plan:

- 1) It was last officially updated in 2008. You are advised to update the plan on at least an annual basis and provide some indication as to the date it was reviewed/revised and a signature of the person evaluating the plan.
- 2) The pollution prevention team members should be updated to reflect new personnel.
- 3) Your SWPPP did have a site plan and was fairly complete. The following items if not already provided with the site plan must be added:
  - a) Facility plan view identifying buildings or equipment areas.
  - b) Identify local streams, lakes, ditches, waterways, storm sewers both on-site and in the immediate vicinity.
  - c) Identify storm water control structures (eg: oil/water separator).
  - d) Identify all storm water outfall location points with designated number (eg: 001, 002, etc.).
  - e) Overall drainage patterns on the site with a topo map superimposed.
  - f) Location of all storm sewers and sanitary sewers with direction of flow.
  - g) Location of potential sources of pollutants such as fuel and waste oil storage, waste material storage, dumpsters, recyclable material storage piles, historical fluff disposal areas, etc...
  - h) Potential sources of pollutants clearly identified on plan or by use of key.
  - i) Identify hardscape such as parking lots and landscape such as grass or other land use.
  - j) Truck and railway lines.
  - k) Site acreage.

#### Inspection Observations

We walked almost the entire perimeter of the site, pictures were taken and the following site observations made:

- 1) Fluids such as antifreeze and used oil are stored outside the maintenance area. Oil stained blacktop was observed around two open top containers. All fluids whether they be raw material or waste should be located above and behind containment to limit contact with storm water.
- 2) The area where the old shredder was located was being leveled and rock is being placed over the top of what appears to be fluff. We requested that you stop the placing of the rock. The material being graded may be fluff. As explained to you during the inspection fluff is considered to be solid waste and must be taken to a properly licensed landfill. We request that you identify this material and determine the extent of its placement.
- 3) A historical fill was observed left over from when the Luntz Corporation owned the site (pre 1996). The fill consists mainly of automobile fluff. This area is thought to be eight to ten acres in size at an unknown depth. Past shredding equipment could not remove metal as efficiently as your newer shredder therefore leaving a significant amount of metal with the fluff. Currently this material is being "mined" by your company using equipment that can separate the metal from the fluff for recycle. Leachate coming from the above grade fill areas was observed, but was not leaving the site.
- 4) There is a stream entering the western portion of your site from the south. It enters a culvert which conveys this stream underground across the site day lighting on the north side via a double culvert. At the time of the inspection there were no visual problems noted with this stream. This feature must be added to the site plan, noting where it originates prior to your site and to what water body it enters off your site.
- 5) On the north side, and at the base of fill area mentioned in item three above, two large metal plates were observed covering a hole surrounded by processed slag rock. A picture was taken inside the opening with a flash to possibly identify what was

underneath the plates. It appears that the plates are covering some sort of inlet such as a catch basin. The plates need to be removed to determine if this is a storm inlet, some other structure, or if it leads to nothing at all.

- 6) There is an oil/water separator located directly north of the shredder. It receives at least storm water from the shredder and area surrounding the shredder. It may also receive excess water that is used to control fugitive dust at the shredder. Reportedly high pressure steam is used in the shredder to mist the area knocking down the dust to control emissions. Excess water may be collecting on the ground and flowing into the separator. The discharge from the oil/water separator is gravity drained to an infiltration trench. This is a shallow trench containing a 24-inch pipe surrounded by gravel and thought to be approximately 200-feet long allowing the effluent from the separator to leach into the ground. As we discussed, we have no record in the Division of Surface Water, NEDO that the oil/water separator/leach line received an approved permit-to-install (PTI). This system may be classified as an unauthorized Class V injection well. We requested that you send us any detail you have on the oil/water separator/leach line. At the very least a PTI will need to be submitted for the oil/water separator to seek its approval and the infiltration trench removed.
- 7) The fuel storage dike located outside the shearer building should be cleaned out and the debris properly disposed at a licensed sanitary landfill. The dike walls need to be rebuilt.
- 8) In the area north of the shearer a cut has been made in the berm that allows storm water in this area to flow north. Please follow up as to where this discharge flows.
- 9) The turnings and bushing storage area located at the eastern portion of the site contains numerous scrap piles that were observed with water soluble oils or lubricating fluids at the base of each pile. Scrap stored in this area is located directly over soil and exposed bedrock. No containment of the oil or runoff from the scrap is provided. It either leaches into the ground or may reach a swale located further east of this area during a heavy rainfall. This is not an acceptable practice. The scrap containing oils must be stored over a containment pad that is capable of collecting and holding the oil for off-site treatment/disposal. An approved PTI Application will be necessary to install the pad(s).

We Request that you respond in writing, to this office, no later than December 21, 2011, with your intentions to resolve the issues concerning the oil/water separator/infiltration trench and the storage of metal scrap containing free oils. Also, as requested during the inspection, we request that you submit a copy of the SWPPP no later than December 21, 2011, so that we may perform a formal review.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136 or by e-mail [phil.rhodes@epa.state.oh.us](mailto:phil.rhodes@epa.state.oh.us).

Sincerely,



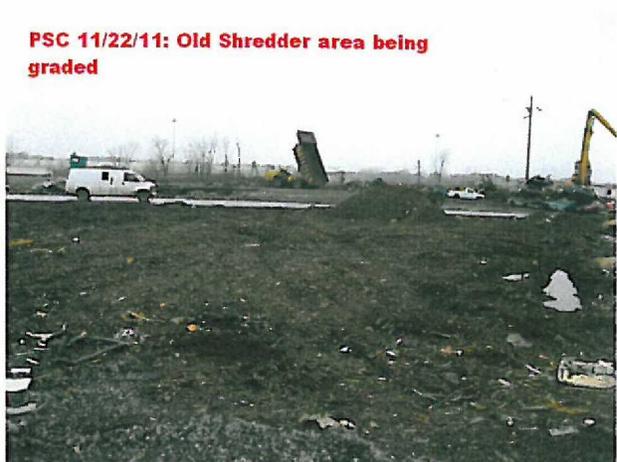
Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water

PR/cs

File: Industrial Stormwater



PSC 11/22/11: open oil containers in maintenance area w/ oil on ground



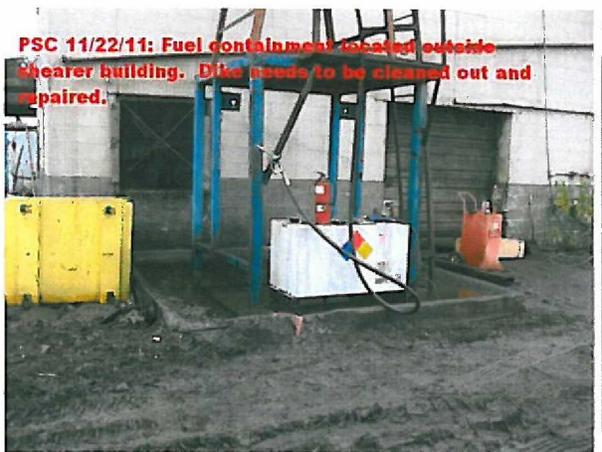
PSC 11/22/11: Old Shredder area being graded



PSC 11/22/11: Old Fluff disposal area on west side of property



PSC 11/22/11: Unknown possible culvert at base of Fluff disposal



PSC 11/22/11: Fuel containment located outside shearer building. Dike needs to be cleaned out and repaired.

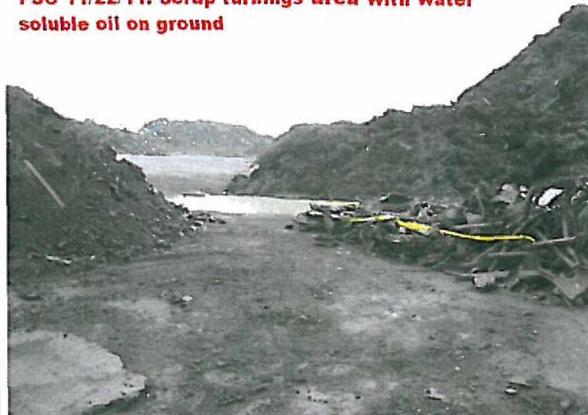


PSC 11/22/11: Cut in berm near shearer allowing runoff from area.

**PSC 11/22/11: Scrap turnings storage w/ water soluble oils on ground**



**PSC 11/22/11: Scrap turnings area with water soluble oil on ground**



**PSC 11/22/11: Storm sewer outflow to creek in area of scrap turnings storage area.**

