



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): September 19, 2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: Huntington Alloys Corp.
Facility Address: 3200 Riverside Drive, Huntington, WV 25705
Facility Latitude: 38.4181
Facility Longitude: -82.3881
County/Parish: Huntington County
Permit No: WV0114618
NAICS Code: 331491
SIC: 3356
Unique Project #: 3E23WN118A

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Point of Contact ☒
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11/07/2023

Date

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Date

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Appendix A: Huntington Alloys National Pollutant Discharge Elimination Permit (No. WV0114618).

Appendix B: Photograph Log

Appendix C: Exhibit Log

- Exhibit 1 – Facility SWPPP, dated May 2023
- Exhibit 2 – EPA ECHO Exceedance Data (September 2020 through September 2023)
- Exhibit 3 – ECHO Detailed Facility Report
- Exhibit 4 – Huntington Alloys Routine Facility Inspections
- Exhibit 5 – Plan of Corrective Action (POCA) dated January 26, 2023
- Exhibit 6 – Construction Diagram, Iron Storage Area

I. INTRODUCTION

On September 19, 2023, a representative from EPA Region III's contractor, PG Environmental (hereinafter, referred to as the EPA Inspector) conducted an industrial stormwater compliance evaluation inspection at Huntington Alloys Corp. (hereinafter, Facility) in Huntington, West Virginia. Huntington Alloys Corp. is the Permittee, and the Facility is owned and operated by Special Metals Corp. A representative from the West Virginia Department of Environmental Protection (WVDEP) also attended the inspection. The purpose of the inspection was to assess the Permittee's compliance with WVDEP's National Pollutant Discharge Elimination System (NPDES) Permit No. WV0114618 (hereinafter, the Permit; refer to [Appendix A](#)), which enables the Facility to operate and maintain a metal tailings earthen impoundment and temporary storage area for the treatment and storage of industrial waste.

The Facility is located at 3200 Riverside Drive, Huntington, WV, and is a high-nickel alloy production plant. Processes such as the melting of raw materials and molds/castings of nickel alloys, re-heating material, and the rolling/milling of cold and heated material take place at the Facility. Approximately 716 staff are employed to operate trucks and equipment, as well as perform administrative functions. The Facility's Stormwater Pollution Prevention Plan (SWPPP) and internal inspection records were available onsite for review (refer to [Appendix C, Exhibits 1 and 4](#)). The SWPPP map identifies two (2) stormwater outfalls, Outfall 001 and Outfall 002. Stormwater from the western side of the Facility is collected via drains into a separate stormwater sewer and discharged via Outfall 001 or Outfall 002. Stormwater from the eastern side of the Facility is collected via drains, combined with process wastewater, and sent to an onsite wastewater treatment plant. Effluent from the onsite treatment plant is discharged to the City of Huntington Wastewater Treatment Plant. The City of Huntington has a pretreatment program which regulates incoming flows from Huntington Alloys.

In addition to the two stormwater outfalls, the Permittee also monitors four groundwater wells that surround the tailings impoundment lagoon in the northwestern corner of the property (refer to [Appendix B, Photographs 6 and 7](#)). The lagoon was no longer in service, but it still contained tailings. It was previously used as part of the Metals Reclaim Facility for the removal of nickel tailings. The lagoon is lined with a two-inch clay liner that is protected with steel plates. The four monitoring wells surrounding the lagoon are monitored semi-annually.

The Permittee utilizes a contract engineering company, Terracon, to conduct their compliance samples. Terracon performs onsite analysis of pH at the outfalls and sends additional quarterly monitoring samples to Pace Analytical. The Facility operational hours vary on the metal production side, but the wastewater plant is operated 24/7. Photographs taken during the inspection are included in [Appendix B](#) (Photograph Log) and documents supporting observations in this report are included in [Appendix C](#) (Exhibit Log).

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspector arrived at the Facility at approximately 9:00 AM (EDT) for the inspection. Mr. Jake Okun of PG Environmental displayed his Clean Water Act inspector credential to the Facility representative upon entry and explained the primary purpose of the inspection was to evaluate the Facility's compliance relevant to the Permit requirements. The EPA Inspector explained that any information that the Facility deemed to be confidential business information ("CBI") should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 describes the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Jake Okun, Inspector	PG Environmental	720-789-8055	jake.okun@pgenv.com
Facility Representatives			
Thomas Bell	Huntington Alloys Corp.	304-526-5228	Tom.Bell@specialmetals.com
WVDEP			
David Dennis	WVDEP	(304) 389-7636	David.a.dennis@wv.gov

Weather and Precipitation

At the time of the inspection, the weather was mostly sunny with a maximum temperature of approximately 80 degrees Fahrenheit; no precipitation was experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below.

Table. 2 Precipitation Preceding Inspection¹

Station Name	Date	Precipitation Amount (inches) ²
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/19/23	0.00
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/18/23	0.41
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/17/23	0.28
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/16/23	0.00
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/15/23	0.00
HUNTINGTON 1.7 ESE, WV US (US1WVCB0017)	9/14/23	0.00

Facility Inspection

As part of the inspection, the EPA Inspector visually observed Facility conditions in the presence of the Facility representative (refer to Appendix B, Photographs 1 through 26). The Facility encompasses approximately 140 acres and contains an office building, an auto maintenance department, a metal reclaim plant, a bar and wire mill, a chip shop, a cold draw building, multiple grinding buildings, cutting buildings, a machine shop, a recycling processing center, a melting shop, primary milling, plating and grinding buildings, a stripping mill, a wastewater pretreatment plant, and an inactive tailings impoundment lagoon. Process wastewater, along with stormwater collected from the eastern side of the Facility enters combined sewers and is treated at the wastewater treatment plant. The treated effluent is sent to the City of Huntington Wastewater Treatment Plant under an industrial user permit.

The Facility representative informed the EPA Inspector that all stormwater runoff from the western side of the Facility is directed to a separate storm sewer through storm drains which are positioned throughout the yard. There are three main stormwater lines on the western side of the Facility: the PM, PMP, and G lines. All convey stormwater to Outfall 001. The Facility representative indicated that these lines had been cleaned in June, 2021 in response to stormwater exceedances for iron, hexavalent chromium, and copper; they were found to contain large amounts of sediment and debris.

Outfall 001 is in the northwest corner of the Facility, next to the Pats Branch Cemetery. The outfall is located within a manhole directly west of the Primary Mill, Primary Plating, and Primary Grinding

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

buildings. Facility representatives indicated that these buildings produce the most dust, which is high in concentrations of metals such as hexavalent chromium and copper (refer to [Appendix B, Photographs 1 through 3](#)). Stormwater drains in these areas contribute runoff to the G line. Outfall 001 is sampled inside of a 66-inch culvert at a manhole in the northwestern corner of the Facility (refer to [Appendix B, Photographs 4 and 5](#)). The outfall discharges into Pat's Branch, a tributary of the Lower Guyandotte River, approximately 0.78 miles from the mouth of the Ohio River.

Outfall 002 is also located in the northwest corner of the Facility, approximately 300 feet northwest of Outfall 001. Stormwater that drains in the northwestern corner of the Facility, mainly from the tailings storage pond area and the metal reclaim building is discharged via Outfall 002 (refer to Appendix B, Photographs 8 and 9). Outfall 002 also discharges into Pat's Branch.

The Facility topography channels process-area stormwater flows to the northwestern corner of the Facility.

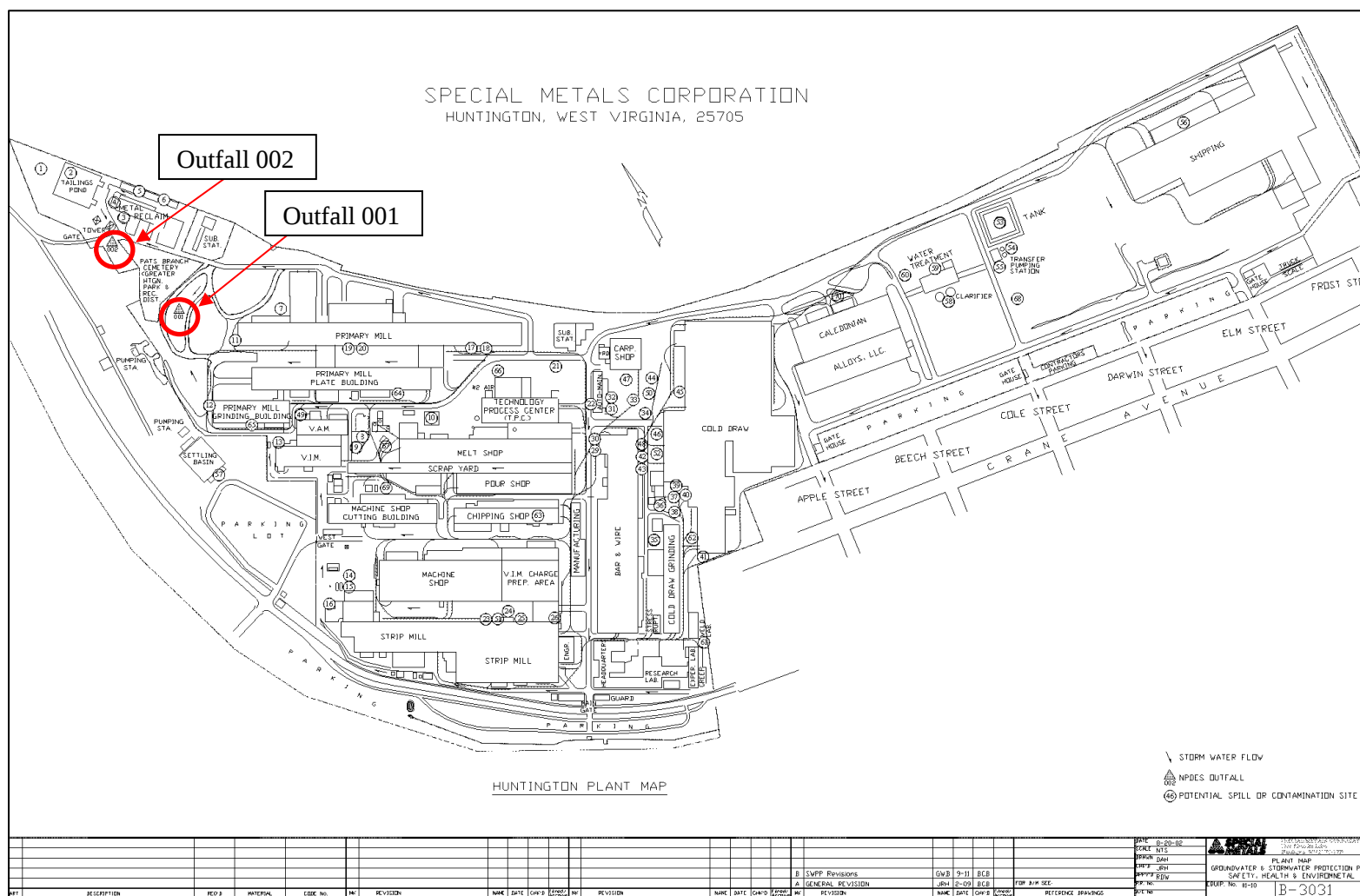


Figure 1. SWPPP site drainage map.

WVDEP administered a Consent Order (No. 9856) to the Facility in October, 2020 in response to the copper, chromium, and iron exceedances from Outfall 001. The EPA Inspector reviewed a Plan of Corrective Action (POCA) that was generated by the Facility on January 26, 2023 regarding continued exceedances of copper, chromium, and iron since the consent order was issued (refer to Appendix C, Exhibit 5). The POCA document outlines continued efforts to minimize exceedances, including frequent inspections of drain filters, collecting surficial samples of stormwater runoff to identify potential pollution

sources, cleaning street surfaces with a street sweeper, inspecting stormwater lines for sediment buildup, and cleaning the lines as needed. The three primary stormwater lines leading to Outfall 001 were last cleaned in June, 2021, and the POCA document indicates that the lines had a large amount of sediment buildup prior to the cleaning which may have been contributing to the exceedances.

Additional details related to the Facility conditions at the time of the inspection are included in the *Summary of Observations* section below.

Summary of Observations

The following section summarizes the Inspection Team's observations relative to the Facility's Permit requirements, including the status of certain treatment units, operation and maintenance practices, and the Facility's monitoring and reporting documentation.

DMR Reporting and Effluent Limit Exceedances

Part C.7 of the Permit states, "The required DMRs shall be received by the agency no later than 25 days following the end of the reporting period in accordance with the following requirements."

And

Part C.19 of the Permit states, "As specified in Section(s) A.001-002 and A.MW001A-MW004A, quarterly monitoring periods are Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec."

Observation 1. According to EPA's Enforcement and Compliance History Online (ECHO) database, the Facility submitted late DMRs in three of the six quarters preceding the inspection, including the most recent quarter (April 1, 2023-June 30, 2023) (refer to [Appendix C, Exhibit 3](#)). The Facility representative stated that DMRs were submitted each quarter, and a WVDEP representative provided a DMR from the Facility that was submitted on June 5, 2023. Facility representatives stated they had believed that the quarterly stormwater monitoring had to be submitted quarterly per fiscal year quarters (i.e., January-March, April-June, July-September, and October-December), which is the way the current Permit (active as of June 1, 2023) outlines the monitoring quarters. However, the previous versions of the Permit required sampling to take place every three months following the active date of the Permit, which was in November (i.e., November-January, February-April, May-July, August-October).

For example, per the previous version of the Permit, the Facility's most recent monitoring results would have been required to be submitted by May 25, 2023 because the "quarter" under the old version was defined as February-April. Since the language in the Permit had been updated to reflect monitoring periods that take place during the conventional fiscal year quarters, the Permittee anticipates that there will no longer be late DMR submittals.

Parts A.001 and A.002 of the Permit list the "Discharge Limitations and Monitoring Requirements" for stormwater Outfalls 001 and 002.

Observation 2. According to EPA's Integrated Compliance Information System (ICIS) database, there have been six (6) daily maximum total iron exceedances from Outfall 001, with the most recent exceedance occurring in March 2023. There have been fifteen (15) daily maximum total recoverable copper exceedances and eight (8) daily maximum hexavalent chromium exceedances since September 2018, with the most recent copper exceedance occurring in June 2023 and the most recent chromium exceedance occurring in December 2022 (refer to [Appendix C, Exhibit 2](#) and [Table 3](#), below).

A Consent Order (No. 9856) was issued to the Facility by WVDEP in October 2020 regarding the copper, chromium, and iron exceedances that were taking place at the Facility. The Facility representative stated that the most likely cause for these exceedances was dust that was generated by the operations at the Primary Mill Plate and Grinding Building, as well as the baghouse building. These buildings are positioned directly adjacent to the G line, one of the primary stormwater lines that feeds Outfall 001 (refer to [Appendix B, Photographs 1 through 3](#)). Facility representatives stated that street sweepers were used daily to help control the dust, but occasionally daily sweeping is missed, and dust gets into the storm drains. There was a heavy amount of dust around the drains during the inspection. The Facility had placed filters over the storm drains to filter out particulates, but the Facility was still experiencing exceedances. The Facility's SWPPP also states that the Facility is looking into upgrading several of the baghouses to help control the dust.

Outfall 002 did not experience any benchmark exceedances in the three years preceding the inspection. The stormwater discharged from Outfall 002 represents stormwater collected from the area surrounding the inactive earthen tailings impoundment lagoon (refer to [Appendix B, Photograph 6](#)).

Table 3. Outfall 001 Effluent Exceedances (September 1, 2018 through September 30, 2023)

Permit #	Monitoring Period End Date	Outfall	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0114618	6/30/2023	001	Copper, total recoverable	0.0606	0.036	mg/L	Daily Maximum
WV0114618	3/31/2023	001	Iron, total (as Fe)	11.1	1.5	mg/L	Daily Maximum
WV0114618	3/31/2023	001	Copper, total recoverable	0.285	0.036	mg/L	Daily Maximum
WV0114618	12/31/2022	001	Chromium, hexavalent (as Cr)	0.026	0.011	mg/L	Daily Maximum
WV0114618	12/31/2022	001	Copper, total recoverable	0.0591	0.036	mg/L	Daily Maximum
WV0114618	6/30/2022	001	Chromium, hexavalent (as Cr)	0.0391	0.011	mg/L	Daily Maximum
WV0114618	6/30/2022	001	Copper, total recoverable	0.0526	0.036	mg/L	Daily Maximum
WV0114618	3/31/2022	001	Chromium, hexavalent (as Cr)	0.0159	0.011	mg/L	Daily Maximum
WV0114618	3/31/2022	001	Copper, total recoverable	0.0915	0.036	mg/L	Daily Maximum
WV0114618	9/30/2021	001	Iron, total (as Fe)	5.27	1.5	mg/L	Daily Maximum
WV0114618	9/30/2021	001	Copper, total recoverable	0.275	0.036	mg/L	Daily Maximum
WV0114618	6/30/2021	001	Iron, total (as Fe)	1.7	1.5	mg/L	Daily Maximum
WV0114618	6/30/2021	001	Copper, total recoverable	0.0989	0.036	mg/L	Daily Maximum
WV0114618	3/31/2021	001	Copper, total recoverable	0.0638	0.036	mg/L	Daily Maximum

Permit #	Monitoring Period End Date	Outfall	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0114618	12/31/2020	001	Chromium, hexavalent (as Cr)	0.012	0.011	mg/L	Daily Maximum
WV0114618	12/31/2020	001	Iron, total (as Fe)	1.84	1.5	mg/L	Daily Maximum
WV0114618	12/31/2020	001	Copper, total recoverable	0.0932	0.036	mg/L	Daily Maximum
WV0114618	9/30/2020	001	Chromium, hexavalent (as Cr)	0.03	0.011	mg/L	Daily Maximum
WV0114618	06/30/2020	001	Copper, total recoverable	0.0591	0.036	mg/L	Daily Maximum
WV0114618	12/31/2019	001	Chromium, hexavalent (as Cr)	0.017	0.011	mg/L	Daily Maximum
WV0114618	12/31/2019	001	Iron, total (as Fe)	1.93	1.5	mg/L	Daily Maximum
WV0114618	12/31/2019	001	Copper, total recoverable	0.078	0.036	mg/L	Daily Maximum
WV0114618	09/30/2019	001	Chromium, hexavalent (as Cr)	0.019	0.011	mg/L	Daily Maximum
WV0114618	09/30/2019	001	Copper, total recoverable	0.295	0.036	mg/L	Daily Maximum
WV0114618	06/30/2019	001	Copper, total recoverable	0.081	0.036	mg/L	Daily Maximum
WV0114618	03/31/2019	001	Iron, total (as Fe)	1.7	1.5	mg/L	Daily Maximum
WV0114618	03/31/2019	001	Copper, total recoverable	0.124	0.036	mg/L	Daily Maximum
WV0114618	12/31/2018	001	Copper, total recoverable	0.07	0.036	mg/L	Daily Maximum
WV0114618	09/30/2018	001	Chromium, hexavalent (as Cr)	0.0236	0.011	mg/L	Daily Maximum

Pollution Control Measures

Appendix A, Part I.3 of the Permit, Duty to Mitigate, states “The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit, which has a reasonable likelihood of adversely affecting human health or the environment.”

Observation 3. The manhole leading to Outfall 001 did not have a secure cover, and there was dust/debris collecting on the inner edge of the manhole that stormwater compliance samples are taken from (refer to [Appendix B, Photographs 4 and 5](#)). The Facility representative indicated that Outfall 001 is located in an area where a lot of dust is generated from the milling and plating processes, and that the dust contains heavy metals.

Observation 4. There was a large, uncovered storage area that was mostly covered by iron components used for operations at the Facility (refer to [Appendix B, Photographs 10 and 11](#)). The iron components were exposed to the weather, and many were experiencing corrosion. The Facility representative stated that this was the primary storage area for the iron components. According to a construction diagram of the Facility that was reviewed by

the EPA Inspector, there were a series of stormwater drains beneath the area where the iron components were being stored, and the drains directed stormwater to Outfall 001 (refer to [Appendix C, Exhibit 6](#)). There were no observed best management practices (BMPs) in place to help prevent iron leaching into the stormwater drains in this area.

Observation 5. There was a puddle of collected water that had a slight sheen and a yellowish tinge in the area where reclaimed sludge is stored prior to being hauled away (refer to [Appendix B, Photographs 12 and 13](#)). Facility representatives stated that their contractor, Quick Response, was in charge of vacuuming settled water, spills, or any inundated drains. They said that after rain events, Quick Response was supposed to look throughout the yard to vacuum any settled water on the ground or in secondary containment areas.

Observation 6. There were various petroleum stains on the ground around the Facility (refer to [Appendix B, Photographs 14-16](#)). It appeared that an absorbent spill cleaning material had been used on some of the stains, but not all of them.

Good Housekeeping

Part C.1 of the Permit states, “The permittee shall practice good housekeeping including maintaining the facility grounds. There shall be no scattered parts, equipment, debris, etc. Any and all drums shall be either stored in a covered area or kept upon pallets and properly sealed.”

Observation 7. There were multiple oil containers, chemical drums, grease barrels, and hazardous waste barrels that were not placed under a roof and not placed on pallets or in secondary containment (refer to [Appendix B, Photographs 17 through 21](#)). A series of oil containers was placed on a pallet outside of a roofed area and had rainwater that had collected on the lids, indicating that it had likely been outside for multiple days (refer to [Appendix B, Photograph 17](#)). When the Facility representative became aware of the containers, they were moved under cover. There was a used oil/grease barrel that was placed under cover and in a contained area, but it was open (refer to [Appendix B, Photograph 19](#)). There were also two barrels that were not placed under cover and they were not in secondary containment (refer to [Appendix B, Photographs 20 and 21](#)). One of the barrels was labeled “used oil” and the other was labeled “hazardous waste.” Additionally, one of the totes in the covered areas was leaking fluid onto the ground (refer to [Appendix B, Photograph 18](#)). The tote was placed inside of a roofed area that had secondary containment (i.e., concrete berms around the perimeter), but Facility representatives were unaware of the leak. A label on the side of the tote said, “Citgo AW HYD 32,” which is a type of oil used in construction, mining, and manufacturing.

Observation 8. There was a full container of sulfuric acid sitting on the deck above one of the clarifiers at the onsite wastewater treatment plant (refer to [Appendix B, Photograph 22](#)). There were also empty containers of gasoline and other chemicals sitting on a platform above one of the pre-mixing tanks at the wastewater treatment plant (refer to [Appendix B, Photograph 23](#)).

Operation and Maintenance

Appendix A, Part II.1 of the Permit, Proper Operation and Maintenance, states “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures.”

Observation 9. There was a damaged wall on one side of the truck wash station located adjacent to the wastewater treatment plant where the Facility's contractor, Quick Response, empties chemical/hazardous waste collected around the Facility (refer to Appendix B, Photographs 24 and 25). Some material from inside the truck wash appeared to have spilled on the ground next to the wall. Additionally, there were multiple open chemical containers sitting on the ground next to the truck wash that were not covered, sealed, or sitting on secondary containment (refer to Appendix B, Photograph 26).

Records Review

The EPA Inspector reviewed records pertaining to Permit requirements. All of the records required by the Permit were provided electronically prior to the inspection by the Facility. The Facility's most recent quarterly electronic discharge monitoring report (eDMR) was provided electronically and reviewed before the inspection. The following records were reviewed:

- EPA ECHO exceedance data during the period from September 1, 2020 through September 30, 2023
- EPA's ICIS exceedance data
- Facility eDMR for the most recent quarter (March-April 2023)
- SWPPP, dated May 2023
- Routine facility inspection records from September 2022 through August 2023
- Facility Spill Prevention Control and Countermeasure (SPCC) Plan, dated June 2022
- POCA Plan

Closing Conference

After the Facility inspection, the EPA Inspector met with the Facility representative for a closing conference and shared preliminary observations. The EPA Inspector reiterated to the Facility representative that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspector upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference, as a result of reviewing additional documentation following the inspection.

The inspection concluded at approximately 2:30 PM (EDT).