



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

April 27, 2007

Re: Belmont County
Wheeling Pittsburgh Steel
Martins Ferry Plant
NPDES Permit OIC00020*DD
Compliance Sampling Inspection
Correspondence (IWW)

Mr. Bud Smith
Wheeling Pittsburgh Steel Corp.
1134 Market Street
Wheeling, WV 26003

Dear Mr. Smith:

On March 5, 2007, Randy Spencer, Kelly Capuzzi and I, of Ohio EPA's Division of Surface Water, conducted a Compliance Evaluation Inspection (CEI) at the Wheeling Pittsburgh Steel Corporation Martins Ferry plant. You represented the Wheeling Pittsburgh Steel Corporation during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, Federal Number OH0011339, State Number OIC00020*CD, and the 2003 Consent Order for Preliminary Injunction (COPI). A copy of the inspection report form are attached.

Based on the evaluation of the facility, the Wheeling Pittsburgh Steel Corporation Martins Ferry plant (WPS-MF) was found to be in **non-compliance** with the permit and the COPI on the day of the inspection due to NPDES permit requirements and effluent violations. The following comments/problems were noted as a result of the inspection:

1. Ohio EPA attempted to collect wastewater samples but the sampler failed. We will reschedule the sampling inspection for sometime in the near future.
2. The NPDES permit for WPS-MF was renewed on August 1, 2004. On August 11, 2003, WPS-MF entered into a COPI with Ohio EPA. A summary of the compliance schedule milestones from these 2 documents including a status of compliance is attached.
3. Since the last inspection report in 2005, WPS-MF has violated the effluent limitations on these occasions at outfall 001:

Zinc, daily maximum - 2 times in 2/05; 4 times in 3/05; 2 times in 7/05; 1 time in 5/06; 1 time in 8/06; 1 time in 10/06 and 1 time in 1/07.

Zinc, monthly average - February, March, and July 2005, and August and October 2006 and January 2007.

pH, daily maximum - 1 time in 4/05; 2 times in 6/05; 3 times in 9/05; 1 time in 10/05; 1 time in 11/05; 2 times in 12/05; 1 time in 5/06; 1 time in 7/06.

Oil and grease daily maximum - 3/25/05.

Every effort must be made to comply with the effluent limits contained in the NPDES permit.

4. There has been one reported unauthorized bypass (outfall 602) from the influent sump since the last inspection: 10/4/06.

WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall.

5. Has WPS-MF shut down the production line due to high water in the influent sump since the last inspection report for the inspection on 2/2/05? If yes, on what occasions and for how long?
6. Part I,C,3 of the NPDES permit and paragraph 13 of the 2003 Consent Order for Preliminary Injunction (COPI) require WPS-MF after 11/1/2004 to sample the final effluent at a sampling and flow meter station at a location after the WWTP effluent line (outfall 601) and the influent sump bypass (outfall 602) re-combine. Sometime after the floods of the fall of 2004, WPS-MF revised it's sampling location for the final discharge to the location of 601. This is an unauthorized location for the sampling of this outfall. WPS-MF is in violation of both the NPDES permit and the COPI for revising the sampling location. WPS-MF must sample in accordance with the NPDES permit and the COPI until the permit is modified to re-designate the outfall location. It is recommended that WPS-MF sample both 601 and 001 until the permit is modified. On what date was the sampler moved?
7. Ohio EPA remains concerned about zinc contamination in the stormwater. WPS MF submitted a Storm Water Pollution Prevention Plan (SWP3) as required by the NPDES permit and the COPI. However, Ohio EPA deemed the SWP3 deficient and requested revisions through correspondence dated November 18, 2004. The NPDES permit part IV item B3 requires the permittee to submit revisions requested by Ohio EPA within 30 days of notification. To date, Ohio EPA has not received a response. Since then, WPS-MF has revised the drainage pattern of the site by eliminating outfalls 003, 004, and 005, rendering most of the plan inaccurate. WPS-MF must update the SWP3 in accordance with the revisions as required by the permit, within 30 days of receipt of this inspection letter.

8. In addition to the revisions already requested for the SWP3, it is necessary for WPS MF to include a Best Management Practices Plan for the control of pollutants during the operation and maintenance of the air pollution control baghouses, especially addressing the changing of the bags and control of baghouse dust and runoff.
9. The WPS-MF bioassay reports (performed by ATEL for WPS) for outfall 001 since the last inspection indicate the following results:

6/28/05 acutely toxic
12/7/05 acutely toxic
5/24/06 acutely toxic
11/7/06 acutely toxic
10. The NPDES permit contains a compliance schedule for WPS-MF to meet Whole Effluent Toxicity limits by 2/1/07. WPS-MF has submitted a Mixing Zone Plan and an NPDES permit modification requesting an increase in the toxicity limit. WPS-MF intends to submit a PTI for installation of a diffuser to aid in compliance with the revised limitations as soon as the NPDES permit modification is issued. In recent correspondence from Tom Waligura there is an indication that there may be changes to the diffuser proposal due to the recent merger of WPS with Esmark. Please provide an update on this issue and whether the permit modification is on hold.
11. WPS submitted 4 Permit to Install applications in 2006, 3 of which have been approved for: replacing the lime slaker with a hydrated lime process (PTI #549576); EQ tank and pumps at outfall 001 (PTI#549569); and replacement of tanks and automation of controls of the waste alkali/acid neutralization system in the mill tributary to outfall 001 (PTI #549582). The last PTI, #549578, needs to be revised per the revision email dated 1/9/07 before it can be approved. It is for a new flow monitoring and sampling station for the influent sump bypass (outfall 602). It is expected that the effluent violations will cease after these improvements are made. Provide a timetable for the completion of construction of these 3 PTIs.
12. Ohio EPA continues to be concerned about the amount of oil and grease present in the influent wet well. On the day of the last inspection, September 14, 2006, the water level in the influent sump was too low to determine the amount of oil and grease present. However, during the March 5, 2007, inspection the amount of oil and grease appeared significantly less than previously present. This is an improvement. WPS-MF must be diligent about reducing the oil and grease that collects in this sump. If the sump has been pumped in the last year, provide a summary of the dates.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes

or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (740) 644-3469 or me for additional information.

Please respond to comments 2 through 12 above, in writing, within 20 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284 at your convenience.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

c: Rachel DeMuth, DSW, CO
c: Tom Behlen, Attorney General's Office
c: AS file

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01C00020*DD	OH0011339	March 5, 2007	C/S	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Wheeling Pittsburgh Steel Corp. 1001 Main Street Martins Ferry, Ohio	1:00 p.m.	August 1, 2004
	Exit Time	Permit Expiration Date
	2:30 p.m.	January 31, 2009

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Bud Smith, Director of Environmental Control	(304) 234-2662
Name, Address and Title of Responsible Official	Phone Number
Bud Smith Wheeling Pittsburgh Steel Corp. 1134 Market Street Wheeling, WV 26003	(304) 234-2662

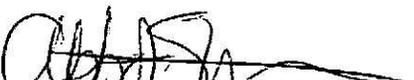
C. AREAS EVALUATED DURING INSPECTION

<u>U</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>U</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>U</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

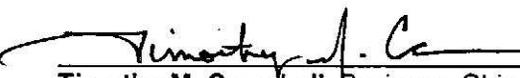
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

Permit - See letter Item 6.
O&M - See letter Item 10 (lime system and neutralization tanks need to be replaced)
Effluent - See letter Item 3
Compliance Schedule - See letter Items 7 and 11
Self Monitoring - See letter Item 6


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

4/27/07
Date


Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

4/27/07
Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted*		X		
i. Number and location of discharge points are as described in permit	X			

Comments: *Flow discharged over the weir wall is a bypass of treatment.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: <u>NPDES Permit</u>	X			
e. Permittee is meeting compliance schedule		X		

Comments: Missed deadline for WET PTI.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator _____ Dual Feed _____		X		
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>3</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: _____			X	
f. Routine and preventive maintenance schedule/performed on time*	X			
g. Any major equipment breakdown since last inspection				
h. Operation and maintenance manual provided and maintained			X	
i. Any plant bypasses since last inspection	X			
j. Regulatory agency notified of bypasses: <u>X</u> on MORS _____ 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection	X			

Comments: *Routine maintenance is improving.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: ____%			X	
b. Any collection system overflows since last inspection (CSO ____ SSO ____)				
c. Regulatory agency notified of overflow (SSOs)				
d. CSO O and M plan provided and implemented				
e. CSOs monitored and reported in accordance with permit				
f. Portable pumps used to relieve system				
g. Lift station alarm systems provided and maintained				
h. Are lift stations equipped with permanent standby power or equivalent				
i. Is there an inflow/infiltration problem (separate sewer system), or 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				

Comments:

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: <u>Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of? _____			X	
e. Is sludge disposal contracted (Name: <u>Short Creek LF in WV</u>)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law				X
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)			X	

Comments:

7

11/16/12

Complete as appropriate for sampling inspections
Do not attach this page when completing reports for evaluation inspections

L. SAMPLING PROCEDURES (FOR CSI'S)

- Grab samples obtained
- Composite obtained
- Compositing frequency: _____ Preservation: _____
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device
- Sample refrigerated during compositing: _____ Yes _____ No
- Sample representative of volume and nature of discharge: _____

Comments: This was a sampling inspection, however the sampler failed.

WHEELING PITTSBURGH STEEL MARTINS FERRY COMPLIANCE SCHEDULES
STATUS AS OF 4/18/07

NPDES PERMIT	COPI #	DESCRIPTION	COMMENTS	DUE DATE	DATE DONE
-	6.	Manhole sediment sampling outfalls 2,3,4,5		11/03/03	10/31/03
-	7.	Submit sampling results and cleaning plan		01/01/04	12/31/03
-	8.	Complete cleaning sewers		08/01/04	10/28/04
-	9.	Sample stormwater at outfalls 2,3,4,5 & submit	eliminated outfalls 3 & 4 8/04; 05 sample data sub 11/01/04; 002 submitted later	10/01/04	12/22/04
Pt IC4	10.	Submit revised SWPPP	Revisions requested 11/18/04	09/01/04	08/30/04
Pt IC4	11.	Implement SWPPP		09/01/04	08/30/04
-	12.	Submit PTI for new sampling and monitoring station		12/01/03	12/28/03
Pt IC3	13.	Complete installation of sampling station		11/01/04	10/31/04
Pt IC2	14.	Install process control equip. to stop process		11/01/04	10/31/04
Pt IA	15.	Begin sampling outfall 601 during overflow		11/02/04	11/01/04
-	17.	Begin removing oil in sump quarterly	They are not required to submit data.	08/01/03	8/01/03
Pt IC1	-	Submit WET limit compliance plan		10/01/04	08/29/04
Pt IC1	-	Response due to OEPA WET plan comments		02/01/05	5/6/05
Pt IC1	-	Sub. PTI & USCOE apps. if necessary for WET		05/01/05	
Pt IC1	-	Begin construction for WET compliance		02/01/06	
Pt IC1	-	Final compliance w/WET limits		02/01/07	

SWPPP = Storm Water Pollution Prevention Plan
WET = Whole Effluent Toxicity
USCOE = US Corps of Engineers