



State of Ohio Environmental Protection Agency

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**Memo to File**

OHD 980 618 177

JAW

Re: Wheeling Pittsburgh Steel Corp.  
OHD082964313 Yorkville, Ohio  
OHD010448231 Martins Ferry, Ohio  
OHD000810382 Steubenville North  
OHD980618177 Steubenville South  
Financial Assurance

Date: May 11, 2009

On May 8, 2009, I completed a review of the financial assurance documentation file for the Wheeling Pittsburgh Steel Corp. (WPS) facilities referenced above. I evaluated the facilities for compliance with financial assurance and liability requirements set forth in OAC rules 3745-55-42, 3745-55-43 and 3745-55-47.

On May 1, 2007, WPS submitted closure plans for the following facilities.

- Yorkville Facility, SPL
- Martins Ferry facility, 2 plans ARCO & "Chem Treat"
- Steubenville North Facility CASOB
- Steubenville South Facility SPL

As of this date, Wheeling Pittsburgh Steel Corp. has not submitted any financial assurance documentation for the facilities referenced above.

***Upon review of the financial assurance documentation, the following violations were observed:***

**OAC rule 3745-55-42(A)**

Wheeling Pittsburgh Steel Corp. has failed to submit closure cost estimates to reflect the closure activities to be conducted;

**OAC rule 3745-55-43**

Wheeling Pittsburgh Steel Corp. has failed to provide financial assurance at least equal to the amount of the closure cost estimates; and

**OAC rule 3745-55-47(A)**

Wheeling Pittsburgh Steel Corp. has failed to provide liability coverage until such time that closure is certified at the facility.

cc: Kristina, Durnell, RISS, DHWM  
Brian Ball, AGO  
Rich Stewart, DHWM, SEDO

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