



Environmental  
Protection Agency

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

October 11, 2011

RE: TRUMBULL COUNTY  
ARCELORMITTAL - WARREN, INC.  
NPDES PERMIT NO. OH0011274  
OHIO EPA PERMIT NO. 3ID00004  
COMPLIANCE EVALUATION INSPECTION

Mr. Jeffrey Foster, Operations Mgr.  
ArcelorMittal – Warren, Inc.  
2234 Main Avenue, SW  
Warren, OH 44481

Dear Mr. Foster:

Ohio EPA conducted an inspection of the above referenced facility on September 29, 2011. Ms. Marian Gammon and you represented ArcelorMittal - Warren, Inc. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

Since the last inspection was conducted on December 8, 2009, the facility has resumed coke production activities. Ms. Gammon explained that while production is steady, it is also slow and expected to take a downturn. She also explained that ArcelorMittal - Warren, Inc. is planning to implement some capital improvements and several major repairs at the facility by the end of 2011 and into 2012.

During the inspection, the following observations and/or deficiencies were noted:

1. Visual observations of Outfall 014 and Outfall 015 did not indicate any evidence of floating oil or excessive suspended solids being discharged to the Mahoning River.
2. Ms. Gammon explained that ArcelorMittal – Warren, Inc. is exploring the feasibility of relocating the automatic composite sampler at Outfall 014 from its present location to the discharge side of the containment area. This is being proposed in response to a suggestion made by this office during the previous inspection.
3. The facility's Storm Water Pollution Prevention Plan (SWPPP) was last revised/ updated in January 2009. Ms. Gammon explained that the SWPPP will be

updated by the end of 2011. The annual comprehensive storm water inspection will be conducted later this year.

4. The facility's current NPDES permit expires on March 31, 2012. Ohio Administrative Code 3745-33-04 stipulates that in order for a permittee to continue to discharge past the expiration date of its permit, a renewal application must be submitted to Ohio EPA no later than 180 days prior to the expiration date. To date, this office has not received a permit renewal application. This requirement was brought to the attention of Ms. Gammon. She explained that the permit renewal application was mostly complete, and would be postmarked by no later than September 30, 2011, which is the deadline to meet the 180 day requirement.

A review of the electronic Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period November 2009 through September 2011 indicated the following violations of the terms and conditions of the NPDES permit:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2010	014	00552	Oil and Grease, Hexane	1D Conc	10	10.8	5/4/2010
May 2010	014	80082	CBOD 5 day	1D Conc	15	33.	5/11/2010
May 2010	014	80082	CBOD 5 day	1D Qty	199	260.501	5/11/2010
April 2011	014	01114	Lead, Total Recoverabl	30D Conc	14	14.7	4/1/2011
April 2011	014	01114	Lead, Total Recoverabl	30D Qty	0.19	.19374	4/1/2011
June 2011	014	80082	CBOD 5 day	1D Conc	15	57.8	6/9/2011
June 2011	014	80082	CBOD 5 day	1D Qty	199	506.678	6/9/2011

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3ID00004*GD	May 2011	014	00400	pH			AF	5/26/2011
3ID00004*GD	May 2011	014	50050	Flow Rate			AF	5/27/2011
3ID00004*GD	May 2011	014	50050	Flow Rate			AF	5/28/2011

Please provide to this office, within 14 days' receipt of this letter, written documentation explaining the causes of the deficiencies noted in this letter, as well as the actions that have been taken or proposed to address them. Your response shall include specific dates for the implementation and completion of this action plan. Please be advised that past or present instances of noncompliance are subject to future legal enforcement action pursuant to Chapter 6111 of the Ohio Revised Code.

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Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1200.

Respectfully,



Tomás Parry  
Environmental Engineer  
Division of Surface Water

TP/cs

Attachment: Pictures

File: Industrial/ArcelorMittal Warren, Inc./Permit/Compliance

