



State of Ohio Environmental Protection Agency

Southeast District Office

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January 5, 2007

**JEFFERSON COUNTY
WPS-STEUBENVILLE NORTH
DHWM/SEDO
OHD000810382**

Mr. Bud Smith, Director, Environmental Control
Wheeling Pittsburgh Steel Corporation
1134 Market Street
Wheeling, WV 26003

Dear Sir:

On December 4, 2006, Jim Michnowicz and I inspected Wheeling Pittsburgh Steel Corporation's (WPSC) Steubenville North facility to determine its compliance with Ohio's hazardous waste laws and regulations as found in the Ohio Revised code and Ohio Administrative Code (ORC and OAC, respectively).

I returned to the facility on December 18, 2006, to collect additional information relating to used oil issues observed during the inspection. Based on the observations and information collected during these inspections, violations of the following regulations were discovered:

- (1) **OAC rule 3745-65-33, Testing and maintenance of equipment:** All facility communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment, where required, must be tested and maintained as necessary to assure proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

At the time of the inspection, WPSC had no logs or summaries of emergency equipment inspections for the past year although it had been a large and small quantity generator during at least two calendar months. To demonstrate compliance, provide copies of these logs for all emergency equipment listed in the contingency plan for the next month that WPSC is either a large or small quantity generator of hazardous waste.

- (2) **OAC rule 3745-279-22(D), Response to releases:** Upon detection of a release of used oil to the environment...a generator must perform the following steps:

- 1) Stop the release; (2) Contain the released used oil; (3) Clean up and properly manage the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil containers or tanks prior to returning them to service.

A) The oil/water separator (OWS) at the south end of the pickler building was discharging used oil onto the adjacent soil/gravel area and the staining on the gravel in this area is additional evidence of past spillage. WPSC must stop the releases in this area and clean up all contaminated soil and gravel. On December 18, 2006, I observed that WPSC had modified this equipment to minimize future releases. B) We observed a used oil drum in the large electrical substation area that had released oil onto nearby soil and gravel. WPSC must remove all contaminated soil and gravel. This material must be evaluated to determine whether it is a hazardous waste prior to disposal. Provide photographs of these areas once contaminated soil and gravel have been removed and prior to the placement of fresh gravel or pavement and provide a copy of the waste evaluation data for the removed soil.

- (3) **OAC Rule 3745-279-22(C), Used oil storage requirements for generators:** Containers and aboveground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words, "Used Oil."

A) The drum of used oil at the substation was not labeled "Used Oil". B) The tank that collects used oil from the oil skimmer was not labeled. To demonstrate compliance, provide photographs showing that the used oil drums in the substation area and the tank near the skimmer have been properly labeled.

We also observed that WPSC has failed to comply with the following requirements of the 2002 Consent Order between Ohio EPA and WPSC:

- (4) **Inspections** (Order V.9.d) and **Major Repair Certification** (Order 9.c.) WPSC failed to detect, record, repair and certify the large crack (approximately ten feet long) in the liner material on the floor of the secondary containment for the FCS/SPL storage tanks (see photographs 1 & 2).

To demonstrate compliance with the Consent Order, WPSC must provide a major repair certification pursuant to the 2002 orders verifying that the liner has been adequately repaired and is free from other defects or deterioration. Additionally, WPSC must provide a copy of the tank system inspection procedures and a copy of the daily inspection form to demonstrate that all conditions cited in the Order (damage, deterioration, accumulation of excessive liquids, Spills, De Minimis Losses, Releases, and signs of Spills or Releases) are being recorded in the daily logs. Provide a copy of the procedures and two months worth of completed inspection logs.

On April 17 and 18, 2006, Robert Smith (USEPA) and I inspected this facility. Based on the inspection, a Notice of Violation was issued to you on June 23, 2006. I received your response on August 18, 2006. Based on the information provided in this response and on the observations made during the September 20, 2006, site visit, WPSC has returned to compliance with the following regulations at the site:

- i. OAC Rule 3745-279-22(C)&(D), Used oil storage requirements for generators.

Additionally, based on the statements in the August, 2006 response and verified during the September 2006 site visit, WPSC has abated the two prohibitions (ORC Rule 3734.02(E)) violations cited during the April 2006 inspection regarding the evaporation of paint waste and disposal of hydrochloric acid. However, WPSC remains in violation of this regulation for the past releases of spent pickle liquor (SPL) as cited below in this letter.

Based on the observations and information obtained during the April 2006 inspection, WPSC has failed to comply with the following requirements of the 2002 Consent Order.

- (5) **Inspections** (Order V.9.d) WPSC's daily inspections did not record the liquid collected within the secondary containment for the storage tanks.

Your August, 2006 response states that the liquid in the containment was rainwater, that the rainwater was removed on April 18, 2006, and that WPSC personnel have been instructed to "include rainwater and other liquids in their inspections." WPSC has not provided the documentation requested in the previous NOV. To demonstrate compliance, provide the documentation cited in #4, above.

- (6) **Major Repair Certification** (Order 9.c): We observed that the sump pump for the load-out pad was not operational. Inspection logs record this deficiency since at least January 23, 2006. WPSC has replaced the pump with a different type of pump than the original pump, however, no certification has been received. To demonstrate compliance with the Order, provide the proper certification for the new pump.

Response to problems found (Order V9.d.ii.): at the load-out pad sump pump and the cracked containment wall around the FCS tanks have been repaired. On October 2, 2006, I received a certification for the containment wall repair, no additional actions are necessary for the containment wall.

Based on the information obtained during the October 12, 2004 inspection, WPSC has failed to comply with the following requirements of the 2002 Consent Order between Ohio EPA and WPSC:

- (7) **Release Response and Reporting** (Order V.9.g.): The Ferrous Chloride Solution Release and Reporting for SN Plant (#E1040-0501-R002) procedures fail to include the following required information: A) necessary cleanup equipment; B) a list of WPSC personnel's names and telephone numbers who are to be notified of a release of FCS; and C) release reporting requirements omit providing the **location** of spills that exceed 30 gallons. In addition, D) the release response procedures incorrectly state that only "releases which exceed 30 gallons" have to be removed within 7 days and managed as hazardous waste. To demonstrate compliance, WPSC must provide a copy of these procedures that include all information required by the Order and make these corrected procedures available to employees who are responsible for responding to these releases.

These violations remain outstanding from the January 27, 1998 inspection:

- (8) **ORC 3734.02(E)&(F), Prohibitions:** This law states, in part, that no person shall store, treat or dispose of hazardous waste without a hazardous waste facility installation and operation permit issued by the Hazardous Waste Facility Board. ORC 3734.02(F) states that no person shall treat, store or dispose of hazardous waste except for the types of facilities specified within this rule; and **OAC rule 3745-55-12(A), Closure Plan:** The owner or operator of a hazardous waste management facility shall have a written closure plan.

WPSC had multiple releases from the former Spent Pickle Liquor (SPL) tank system with varying degrees of soil removal and documentation. WPSC's contractor performed soil sampling in the area of these releases in December, 2003. Based on the results from those samples, which exceeded generic background levels, Ohio EPA has determined that SPL releases to soil have occurred. WPSC must provide a closure plan that addresses additional sampling to determine the nature and extent of these releases.

This violation will be abated, in part, when a closure plan for this unit, approved by Ohio EPA, is implemented and a closure certification/report has been received, demonstrating the attainment of the performance standards in OAC Rule 3745-66-11.

Please provide the documentation requested above to this office **within 30 days** of the date of this letter. If you have any questions, please call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

cc: Pat Smith, WPSC-Steubenville South Plant
Brian Ball, AGO
Jim Kavalec, DHWM, CO
Robert D. Smith, U.S. EPA, Region V

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

Ohio Environmental Protection Agency
RCRA SUBCELLULAR SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHD000810382								
3. Site Name	Name: Wheeling Pittsburgh Steel Corp.						Website (optional:)		
4. Site Location Information	Street Address: South Third Street								
	City, Town, or Village: Steubenville				State: OH				
	County Name: Jefferson				Zip Code: 43952				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) www.census.gov/epcd/www/naics.htm	A.			B.					
	C.			D.					
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Patrick			MI:	Last Name: Smith				
	Phone Number: 740-283-5542				Phone Number Extension:				
	E-Mail Address:								
	Fax Number: 740-283-5779				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:			Country:			Zip Code:		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):					
	Same								
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 1134 Market Street								
	City, Town, or Village: Wheeling			Owner Phone #:					
	State: WV			Country:		Zip Code: 26003			
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Same								
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>								
Street or P.O. Box:									
City, Town, or Village:			Operator Phone #:						
State:			Country:		Zip Code:				
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/>	Not Regulated								

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input checked="" type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	

B. Universal Waste Activities		C. Used Oil Activities	
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/> 1. Used Oil Generator	(Indicate Type(s) of Activity(ies))	
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input type="checkbox"/> 2. Used Oil Transporter	<input type="checkbox"/> Transporter	
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste	<input type="checkbox"/> Transfer Facility	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner	
(accumulates 5,000 kg or more).	<input type="checkbox"/> Processor	Indicate Type(s) of Activity(ies)	
<input type="checkbox"/> 3. Destination Facility for Universal Waste	<input type="checkbox"/> Re-refiner	<input type="checkbox"/> 4. Off-Specification Used Oil Burner	
(Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> 5. Used Oil Fuel Marketer -	Indicate Type(s) of Activity(ies)	
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner	
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner		

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAinfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

K062	D001	D002	D007	D008	D018	D035
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:
N	Tanks?	Other comments: Several <90 day storage areas, at least two former, unclosed areas: former CAS-OB baghouse and former Oxygen Plant waste storage area.
Y	Containers?	

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Rich Stewart	Jim Michnowicz	12/4/06- 10:00-4:00

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Wheeling Pittsburgh Steel Corporation North Plant

Facility Type: LQG

EPA ID#: OHD000810382

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage <small>(e.g. container, tank, etc)</small>	Type of On- Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.	
1	Hydraulic equipment, compressor motors	used oil	N/A	10,000 gal/mo	a) 20,000 gal AST;b) concrete O/W separator c) sump below pickler	NA	a) AST and OWS south of pickler mill, ~15' and ~100' respectively; b) sump in pickler basement	GEM, Inc. Cleveland, OH
2	Scale removal	Ferric Chloride Solution SPL	per 2002 Order not K062 K062	208,000 lbs/mo 45,100 lbs infrequent	20,000 gal AST Same	Spills to pickler sumps go to WWTP	Pickler Bldg	AMROX - Warren OH & Allensport, Pa - recycling Reserve Environmental Services Inc. Ashtabula, OH - Treatment
3	Painting	paint/solvent mixture	D001/D035	Unknown	drum	NA	Armature shop	Not shipped yet
4	Coke oven gas (COG) distribution lines	coke oven gas condensate	D018 if not returned to orig. process	up to 1000 gal/day	drip legs and "torpedo" tanks	NA	Along COG line	WPSC Coke Plant Follansbee, WV recycled back into coal tar operations
5	Painting	paint waste	D001, D035	infrequent	containers	NA	paint shop	Chemtron Avon, OH

REMARKS-GENERAL INFORMATION

General Process Information:

Wheeling Pittsburgh Steel Steubenville North Plant's operations include a blast a pickling line for carbon steel and a temper mill, a blast furnace was operated until 2005 (primary iron production). Besides these operations, this plant also has electrical, motor, mechanical, pump repair shops and a portion of the property is leased to a briquetting plant (P.F. Environmental). The pickling operation generates spent pickle liquor (SPL) which is K062 when it is not managed and recycled according to a 2002 Consent Order with Ohio EPA.

Regulatory/Enforcement History (if applicable):

MF 0 has been referred to the Ohio Attorney General's Office for various violations. The case is currently in negotiations.

Active hazardous waste accumulation areas:

- 1) Armature shop – paint/solvent waste.
- 2) FCS/SPL tank system

Former RCRA storage or disposal areas:

- 1) SPL–contaminated soil pile – located due east of former oxygen plant, generator closed 1995
- 2) TCE disposal area/storm sewer- removed contaminated soil and flushed portion of sewer during 1995 generator closure.
- 3) SPL release areas – Ohio EPA is currently seeking RCRA closure for these releases including groundwater monitoring.

Other:

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. Of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Level D

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
4. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
5. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A

6. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

7. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes No N/A

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

8. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
 - a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

9. Does the generator export hazardous waste? If so: Yes No N/A
 - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A

- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A
- e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A

11. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity of the waste they generate.

15. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

16. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

18. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

20. Is the personnel training program conducted by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
21. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A
24. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

CONTINGENCY PLAN

25. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
26. Does the plan describe the following:
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
- b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
- d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A
- e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

27. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A

28. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A

29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

31. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A

32. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal alarm system? [3745-65-32(A)] Yes No N/A

b. Emergency communication device? [3745-65-32(B)] Yes No N/A

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A

d. Water of adequate volume/pressure? [3745-65-32(D)] Yes No N/A

NOTE: Verify that the equipment is listed in the contingency plan.

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

35. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-34(A))? [3745-65-34(A)] Yes No N/A

36. If there is only one employee on the premises is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A
37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A
39. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

40. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
 - b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
 - c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No N/A
 - d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
 - e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A
 - c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A
No containers were being stored in <90 areas during the inspection.
43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
44. Are hazardous wastes stored in containers which are:

- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
46. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
47. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
48. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
49. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

50. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

51. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A
52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A
53. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:** Yes No N/A ___ RMK# ___
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes No N/A ___ RMK# ___
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A ___ RMK# ___
4. Does the generator generate a characteristic hazardous waste? **If so:** Yes No ___ N/A ___ RMK# ___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes ___ No N/A RMK# ___
- NOTE:** *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes ___ No N/A ___ RMK# ___
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ___ No N/A RMK# ___
- NOTE:** *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*
6. Has the generator **correctly** determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A ___ RMK# ___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A ___RMK#___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A ___RMK#___

Note: In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A ___RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes ___ No N/A ___RMK#___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No N/A ___RMK#___

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:** Yes ___ No N/A ___RMK#___

a. Has the facility complied with 3745-270-04? Yes ___ No N/A ___RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A RMK#
14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A RMK#
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes No N/A RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes No N/A RMK#
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes No N/A RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK#
- NOTE:** *Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))*
18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A RMK#

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.

5. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes No N/A ___ RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes No N/A ___ RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

NOTE: If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A X RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A X RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A X RMK# ___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No X N/A ___ RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A X RMK# ___
10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No N/A X RMK# ___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A X RMK#___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A X RMK#___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A X RMK#___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A X RMK#___
- NOTE:** *If immobilization has been used in a treatment train, it must be the last treatment technology used.*
4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A X RMK#___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A X RMK#___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes___ No___ N/A X RMK#___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ___ No N/A X RMK#___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A X RMK#___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes___ No___ N/A X RMK#___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes___ No___ N/A X RMK#___

b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A RMK# ___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No N/A RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ___ N/A RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/A RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No N/A RMK# ___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes ___ No N/A RMK# ___
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A RMK# ___
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A RMK# ___
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A RMK# ___
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No N/A RMK# ___
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** Yes ___ No ___ N/A RMK# ___
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

- a. Copies of all notices and certifications required in 3745-270? Yes ___ No ___ N/A RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A RMK# ___
- c. Followed the testing frequency specified in the facility's WAP? Yes ___ No N/A RMK# ___

REMARKS

USED OIL INSPECTION CHECKLIST

Wheeling Pittsburgh Steel Corporation

Date: 10/12/2004

EPA I.D.: OHD000810382

PROHIBITIONS

- 1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)] Yes ___ No N/A RMK# ___
- 2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
- 3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

- 4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
- 5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
- 6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)] Yes ___ No N/A RMK# ___
- 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
- 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] Yes ? No N/A ___ RMK# 1
- 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release? Yes ___ No N/A ___ RMK# 2
 - b. Contained the release? Yes ___ No N/A ___ RMK# 2
 - c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A ___ RMK# 2
 - d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A ___ RMK# 2
- 10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___
 - a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No N/A RMK# ___

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes No N/A RMK#

c. Are the combustion gases from heater vented to the ambient air?

Yes No N/A RMK#

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes No N/A RMK#

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes No N/A RMK#

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes No N/A RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A RMK#

REMARKS

#1 At least one drum of used oil at the electric substation was not labeled, the tank collecting used oil from the skimmer was not labeled.

#2 Used oil was released onto the ground around the oil/water separator at the pickler building. The contaminated soils from these releases had not been removed and properly disposed. The oil/water separator continues to release used oil onto soil.

**JEFFERSON COUNTY
WPSC NORTH PLANT
12/4/06 – Rich Stewart**



Figure 1



Figure 2

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> <i>Tatich</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: <i>Bud Smith, Director, Env. Control Wheeling Pittsburgh Steel 1134 Market St. Wheeling, WV 26003</i>	B. Received by (Printed Name) <i>TATICH</i> C. Date of Delivery <i>1-10-07</i> D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number (Transfer from service label)	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
PS Form 3811, February 2004	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes 7005 1820 0008 1262 1872 Domestic Return Receipt 102595-02-M-1540

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