



Environmental  
Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 9, 2012

RE: **RG STEEL/SEVERSTAL  
2006-2010 ANNUAL REPORTS  
NOTICE OF VIOLATION**

**CERTIFIED MAIL 7011 0470 0002 3496 4604**

Kieth McLaughlan  
RG Steel Warren, LLC  
f.k.a. Severstal Warren, Inc. & WCI Steel, Inc.  
1040 Pine Avenue SE  
Warren, OH 44483-6528

Dear Mr. McLaughlan:

The Ohio Environmental Protection Agency (Ohio EPA) Northeast District Office (NEDO) Division of Materials and Waste Management (DMWM) has completed a review of the response to a September 21, 2011 Notice of Violation (NOV). The response was received on January 9, 2012.

The following are Ohio EPA's comments regarding the January 9, 2012 response. These comments were already forwarded to your consultant via e-mail on March 27, 2012. Note that the following four violations cited in the September 21, 2011 NOV have not been resolved.

**I. VIOLATION ONE  
PHASE I AND II  
EXCEEDANCE OF INTERIM WASTE LIMITS  
OAC RULE 3745-30-14(M)(1)(i)**

In response to this violation, a plan for correcting the interim waste grades was presented in RG's December 21, 2011 correspondence. In addition, the company submitted a PTI alteration request for revised phasing on October 6, 2011. A NOD letter for this request was sent to the company on February 16, 2012. As noted in Deficiency One of the letter, RG was directed to include the plan in the revised PTI alteration request. This violation remains unresolved until all waste has been relocated into approved vertical and horizontal waste limits.

**II. VIOLATION TWO  
PHASE I AND II  
EXCEEDANCE OF FINAL WASTE GRADES  
OAC RULE 3745-30-14(M)(1)(i)**

Responding on January 17, 2012 to the NOD letter for the phasing request, RG stated "...Overheight issues for Phase 1 and 2 presented in the September 21, 2011 NOV letter exist on the north edges of Phases 1 and 2..." Later in the response, the company states clean material is utilized on the west, south and east perimeter of the active phases to control surface water from running out of the landfill. On plan sheet 2 of 3 in the December 21, 2011 NOV response for the annual reports, an overheight of 1,566 cys is documented in the southwest corner of Phase 1 and the northeast corner of Phase 2. During the site visit on December 13, 2011, an inspection of these areas was conducted. Ohio EPA was under the impression that the overheight areas were due to berms being constructed of solid waste. The Agency also recalls that a contractor was on site that day discussing methods to resolve the overheight. Given the various inconsistencies, RG is asked to provide clarification in the revised PTI alteration request. Similar to Comment One, this violation remains unresolved until all waste has been relocated into approved vertical and horizontal waste limits.

**III. VIOLATION THREE  
INTERMEDIATE COVER  
OAC RULE 3745-30-14(M)(1)(d)**

In response to the initial violation, RG provided a response in the December 21, 2011 correspondence. Upon review of this response, the company has been directed to further address this violation in Deficiency Two of the February 16, 2012 NOD letter for the revised phasing request. In addition to this violation being unresolved, RG must comply with the PTI alteration approval (dated December 14, 2004) which addresses this issue.

**IV. VIOLATION FOUR  
LEACHATE MANAGEMENT SYSTEM  
OAC RULE 3745-30-14(M)(3)**

At the top of page 5 of its December 21, 2011 letter, the following text was provided: "...RG Steel has included the monthly Discharge Monitoring Reports (DMRs) for 2010 as Attachment 2 to this letter. In addition, there is a flow meter located in the wastewater treatment plant that receives leachate from the landfill leachate transfer system. The flow meter is logged each day by RG Steel. Also

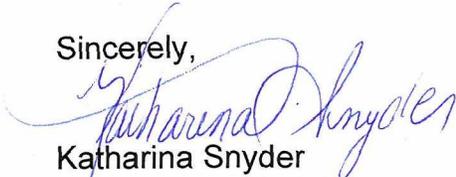
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included in Attachment 2 to this letter is a summary of the leachate transferred from the landfill to the treatment plant as recorded by the flow meter..." The correspondence included an Attachment 2 titled "Facility DMRs." Although a summary of the transferred leachate from the flow meter was provided in the attachment, the DMRs for 2010 were not included. This violation remains outstanding until the DMRs are provided.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the Entity from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts for remedying conditions resulting from any release of contaminants to the environment.

Please submit a response to this letter by August 9, 2012. If you have any questions concerning this letter, please contact me at (330) 963-1257.

Sincerely,



Katharina Snyder  
Division of Materials and Waste Management

KS:cl

cc: Kevin Francis, Trumbull County Health Department  
File: [Sowers/LAND/RG Steel/Severstal/ANN/78]  
DMWM #s 277,1395, 2478, 3241, 3880