



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

December 24, 2008

RE: TRUMBULL COUNTY  
SEVERSTAL WARREN, INC.  
(FORMERLY WCI STEEL, INC)  
NPDES PERMIT NO. OH0101079  
OHIO EPA PERMIT NO. 3ID00071  
COMPLIANCE EVALUATION INSPECTION

Mr. Mark Clark, Mgr. Environmental Control  
Severstal Warren, Inc.  
1040 Pine Avenue, S.E.  
Warren, Ohio 44483

Dear Mr. Clark:

On November 24, 2008, I met with you and proceeded to conduct a Compliance Evaluation Inspection at Severstal Warren, Inc. Upon arriving at the facility, I was advised that production activities had been "idled" due to the significant downturn in the economy. Hence, no steelmaking activities were ongoing. Based on these circumstances, the inspection was limited to a review of the effluent discharge quality at the respective outfalls. In the absence of Mr. Jim Lester, the site tour was provided by Mr. Keith McLaughlin, Environmental Engineer.

The review of the respective facility outfalls and associated treatment systems noted the following:

- Visual observations of the various outfalls did not indicate any evidence of floating oil or excessive suspended solids being discharged to the Mahoning River.
- The general operation and maintenance of the Outfall 603 lagoon system appeared to be satisfactory.
- The two pH probes at Outfall 602 were displaying significantly different results. Upon confirming with the operator, Mr. McLaughlin indicated that the units had just been cleaned and required about 30-60 minutes to accurately "reset".
- There was no visible readout at the Outfall 013 flow meter. Please provide clarification as to how flow is being read and recorded at this location.

A review of the facility's monthly operating reports received by Ohio EPA for the period January through November 2008 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

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Numeric Effluent Violations						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2008	008	Oil and Grease, Total	30D Conc	15	37.7666	2/1/2008
February 2008	008	Oil and Grease, Total	1D Conc	20	47.1	2/5/2008
February 2008	008	Oil and Grease, Total	1D Conc	20	53.9	2/26/2008
March 2008	011	pH	1D Conc	9.0	9.5	3/11/2008
June 2008	602	Total Suspended Solids	1D Qty	750	860.447	6/3/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.91	11/2/2008
November 2008	602	pH, Minimum	1D Conc	7.0	3.86	11/2/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.74	11/3/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.76	11/4/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.07	11/6/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.03	11/7/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.48	11/8/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.01	11/10/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.07	11/10/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.36	11/11/2008
November 2008	602	pH, Minimum	1D Conc	7.0	.44	11/11/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.24	11/12/2008
November 2008	602	pH, Maximum	1D Conc	10.0	12.43	11/13/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.64	11/13/2008
November 2008	602	pH, Maximum	1D Conc	10.0	10.03	11/14/2008
November 2008	602	pH, Minimum	1D Conc	7.0	1.09	11/14/2008
November 2008	602	pH, Minimum	1D Conc	7.0	1.43	11/15/2008
November 2008	602	pH, Minimum	1D Conc	7.0	1.49	11/17/2008
November 2008	602	pH, Minimum	1D Conc	7.0	1.48	11/18/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.84	11/19/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.8	11/21/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.64	11/22/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.48	11/24/2008
November 2008	602	pH, Minimum	1D Conc	7.0	6.75	11/27/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.95	11/29/2008
November 2008	602	pH, Minimum	1D Conc	7.0	2.84	11/30/2008

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
August 2008	007	Water	1/Day	1	0	08/01/2008
August 2008	007	Water	1/Day	1	0	08/02/2008
August 2008	007	Water	1/Day	1	0	08/03/2008
August 2008	007	Water	1/Day	1	0	08/04/2008
August 2008	007	Water	1/Day	1	0	08/05/2008
August 2008	007	Water	1/Day	1	0	08/07/2008
August 2008	007	Water	1/Day	1	0	08/08/2008
August 2008	007	Water	1/Day	1	0	08/09/2008
August 2008	007	Water	1/Day	1	0	08/10/2008
August 2008	007	Water	1/Day	1	0	08/11/2008
August 2008	007	Water	1/Day	1	0	08/13/2008
August 2008	007	Water	1/Day	1	0	08/14/2008

Monitoring/Reporting Violations						
Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
August 2008	007	Water	1/Day	1	0	08/15/2008
August 2008	007	Water	1/Day	1	0	08/16/2008
August 2008	007	Water	1/Day	1	0	08/17/2008
August 2008	007	Water	1/Day	1	0	08/18/2008
August 2008	007	Water	1/Day	1	0	08/20/2008
August 2008	007	Water	1/Day	1	0	08/21/2008
August 2008	007	Water	1/Day	1	0	08/22/2008
August 2008	007	Water	1/Day	1	0	08/23/2008
August 2008	007	Water	1/Day	1	0	08/24/2008
August 2008	007	Water	1/Day	1	0	08/25/2008
August 2008	007	Water	1/Day	1	0	08/27/2008
August 2008	007	Water	1/Day	1	0	08/28/2008
August 2008	007	Water	1/Day	1	0	08/29/2008
August 2008	007	Water	1/Day	1	0	08/30/2008
August 2008	007	Water	1/Day	1	0	08/31/2008
September 2008	010	Flow Rate	1/Day	1	0	09/02/2008
September 2008	010	Flow Rate	1/Day	1	0	09/03/2008
September 2008	010	Flow Rate	1/Day	1	0	09/04/2008
September 2008	010	Flow Rate	1/Day	1	0	09/05/2008
September 2008	010	Flow Rate	1/Day	1	0	09/06/2008
September 2008	010	Flow Rate	1/Day	1	0	09/07/2008
September 2008	010	Flow Rate	1/Day	1	0	09/09/2008
September 2008	010	Flow Rate	1/Day	1	0	09/10/2008
September 2008	010	Flow Rate	1/Day	1	0	09/11/2008
September 2008	010	Flow Rate	1/Day	1	0	09/12/2008
September 2008	010	Flow Rate	1/Day	1	0	09/13/2008
September 2008	010	Flow Rate	1/Day	1	0	09/14/2008
September 2008	010	Flow Rate	1/Day	1	0	09/16/2008
September 2008	010	Flow Rate	1/Day	1	0	09/17/2008
September 2008	010	Flow Rate	1/Day	1	0	09/18/2008
September 2008	010	Flow Rate	1/Day	1	0	09/19/2008
September 2008	010	Flow Rate	1/Day	1	0	09/20/2008
September 2008	010	Flow Rate	1/Day	1	0	09/21/2008
September 2008	010	Flow Rate	1/Day	1	0	09/23/2008
September 2008	010	Flow Rate	1/Day	1	0	09/24/2008
September 2008	010	Flow Rate	1/Day	1	0	09/25/2008
September 2008	010	Flow Rate	1/Day	1	0	09/26/2008
September 2008	010	Flow Rate	1/Day	1	0	09/27/2008
September 2008	010	Flow Rate	1/Day	1	0	09/28/2008
September 2008	010	Flow Rate	1/Day	1	0	09/29/2008
September 2008	010	Flow Rate	1/Day	1	0	09/30/2008

In addition to the above, Attachment 2 lists the Data Substitution Codes, i.e. "AF" and "AD", reported during the review period. Where practical and feasible, alternative sampling locations should be identified to reduce the use of the "AF" code.

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Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response **shall** include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA

In closing, the pending NPDES permit modification and transfer requests are being evaluated by Ohio EPA. Final determinations by the Director of Ohio EPA will be addressed under separate cover.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



Ermelindo Gomes  
Environmental Engineer  
Division of Surface Water

EG/mt

File: Industrial/Severstal Warren/Permit-Compliance

## Attachment 2: Reported "AF" and "AD" Codes (WCI Steel)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Date
January 2008	003	Flow Rate			AF	1/3/2008
January 2008	003	pH			AF	1/3/2008
January 2008	003	Oil and Grease, Total			AF	1/3/2008
January 2008	003	Flow Rate			AF	1/9/2008
January 2008	003	pH			AF	1/9/2008
January 2008	003	Oil and Grease, Total			AF	1/9/2008
January 2008	003	pH			AF	1/15/2008
January 2008	003	Oil and Grease, Total			AF	1/15/2008
January 2008	003	Flow Rate			AF	1/16/2008
January 2008	003	Flow Rate			AF	1/23/2008
January 2008	003	pH			AF	1/23/2008
January 2008	003	Oil and Grease, Total			AF	1/23/2008
February 2008	003	Water Temperature			AD	2/4/2008
February 2008	003	Flow Rate			AF	2/5/2008
February 2008	003	pH			AF	2/5/2008
February 2008	003	Zinc, Total Recoverabl			AF	2/5/2008
February 2008	003	Oil and Grease, Total			AF	2/5/2008
February 2008	003	Water Temperature			AD	2/5/2008
February 2008	003	Flow Rate			AF	2/12/2008
February 2008	003	pH			AF	2/12/2008
February 2008	003	Zinc, Total Recoverabl			AF	2/12/2008
February 2008	003	Oil and Grease, Total			AF	2/12/2008
February 2008	003	Flow Rate			AF	2/19/2008
February 2008	003	pH			AF	2/19/2008
February 2008	003	Zinc, Total Recoverabl			AF	2/19/2008
February 2008	003	Oil and Grease, Total			AF	2/19/2008
February 2008	003	Flow Rate			AF	2/26/2008
February 2008	003	pH			AF	2/26/2008
February 2008	003	Zinc, Total Recoverabl			AF	2/26/2008
February 2008	003	Oil and Grease, Total			AF	2/26/2008
March 2008	003	Flow Rate			AF	3/4/2008
March 2008	003	pH			AF	3/4/2008
March 2008	003	Oil and Grease, Total			AF	3/4/2008
March 2008	003	Water Temperature			AF	3/4/2008
March 2008	003	Flow Rate			AF	3/11/2008
March 2008	003	pH			AF	3/11/2008
March 2008	003	Oil and Grease, Total			AF	3/11/2008
March 2008	003	Water Temperature			AF	3/11/2008
March 2008	003	Flow Rate			AF	3/18/2008
March 2008	003	pH			AF	3/18/2008
March 2008	003	Oil and Grease, Total			AF	3/18/2008
March 2008	003	Water Temperature			AF	3/18/2008
March 2008	003	Flow Rate			AF	3/25/2008
March 2008	003	pH			AF	3/25/2008
March 2008	003	Oil and Grease, Total			AF	3/25/2008
March 2008	003	Water Temperature			AF	3/25/2008
April 2008	003	Flow Rate			AF	4/2/2008
May 2008	003	Flow Rate			AF	5/6/2008

## Attachment 2: Reported "AF" and "AD" Codes (WCI Steel)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Date
May 2008	003	pH			AF	5/6/2008
May 2008	003	Oil and Grease, Total			AF	5/6/2008
May 2008	003	Flow Rate			AF	5/13/2008
May 2008	003	Flow Rate			AF	5/20/2008
July 2008	003	Flow Rate			AF	7/16/2008
September 2008	003	Flow Rate			AF	9/16/2008
November 2008	003	Flow Rate			AF	11/18/2008
November 2008	003	Flow Rate			AF	11/26/2008
January 2008	006	Flow Rate			AF	1/16/2008
February 2008	006	Flow Rate			AF	2/12/2008
February 2008	006	pH			AF	2/12/2008
February 2008	006	Zinc, Total Recoverabl			AF	2/12/2008
February 2008	006	Oil and Grease, Total			AF	2/12/2008
February 2008	006	Flow Rate			AF	2/26/2008
February 2008	006	pH			AF	2/26/2008
February 2008	006	Zinc, Total Recoverabl			AF	2/26/2008
February 2008	006	Oil and Grease, Total			AF	2/26/2008
March 2008	006	Flow Rate			AF	3/11/2008
March 2008	006	pH			AF	3/11/2008
March 2008	006	Oil and Grease, Total			AF	3/11/2008
March 2008	006	Flow Rate			AF	3/18/2008
March 2008	006	pH			AF	3/18/2008
March 2008	006	Oil and Grease, Total			AF	3/18/2008
March 2008	006	Flow Rate			AF	3/25/2008
March 2008	006	pH			AF	3/25/2008
March 2008	006	Oil and Grease, Total			AF	3/25/2008
January 2008	007	Flow Rate			AF	1/3/2008
January 2008	007	Flow Rate			AF	1/9/2008
January 2008	007	Flow Rate			AF	1/16/2008
January 2008	007	Flow Rate			AF	1/23/2008
February 2008	007	Flow Rate			AF	2/5/2008
February 2008	007	Flow Rate			AF	2/12/2008
February 2008	007	Flow Rate			AF	2/19/2008
February 2008	007	pH			AF	2/19/2008
February 2008	007	Zinc, Total Recoverabl			AF	2/19/2008
February 2008	007	Lead, Total Recoverabl			AF	2/19/2008
February 2008	007	Copper, Total Recovers			AF	2/19/2008
February 2008	007	Oil and Grease, Total			AF	2/19/2008
February 2008	007	Flow Rate			AF	2/26/2008
March 2008	007	Flow Rate			AF	3/4/2008
March 2008	007	Flow Rate			AF	3/11/2008
March 2008	007	pH			AF	3/11/2008
March 2008	007	Zinc, Total Recoverabl			AF	3/11/2008
March 2008	007	Lead, Total Recoverabl			AF	3/11/2008
March 2008	007	Copper, Total Recovers			AF	3/11/2008
March 2008	007	Oil and Grease, Total			AF	3/11/2008
March 2008	007	Flow Rate			AF	3/18/2008
March 2008	007	pH			AF	3/18/2008

## Attachment 2: Reported "AF" and "AD" Codes (WCI Steel)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Date
March 2008	007	Zinc, Total Recoverabl			AF	3/18/2008
March 2008	007	Lead, Total Recoverabl			AF	3/18/2008
March 2008	007	Copper, Total Recovers			AF	3/18/2008
March 2008	007	Oil and Grease, Total			AF	3/18/2008
March 2008	007	Flow Rate			AF	3/25/2008
March 2008	007	pH			AF	3/25/2008
March 2008	007	Zinc, Total Recoverabl			AF	3/25/2008
March 2008	007	Lead, Total Recoverabl			AF	3/25/2008
March 2008	007	Copper, Total Recovers			AF	3/25/2008
March 2008	007	Oil and Grease, Total			AF	3/25/2008
April 2008	007	Flow Rate			AF	4/3/2008
April 2008	007	Flow Rate			AF	4/9/2008
April 2008	007	Flow Rate			AF	4/16/2008
April 2008	007	Flow Rate			AF	4/23/2008
May 2008	007	Flow Rate			AF	5/6/2008
May 2008	007	Flow Rate			AF	5/13/2008
May 2008	007	Flow Rate			AF	5/20/2008
May 2008	007	Flow Rate			AF	5/28/2008
June 2008	007	Flow Rate			AF	6/3/2008
June 2008	007	Flow Rate			AF	6/10/2008
June 2008	007	Flow Rate			AF	6/17/2008
June 2008	007	Flow Rate			AF	6/24/2008
July 2008	007	Flow Rate			AF	7/2/2008
July 2008	007	Flow Rate			AF	7/9/2008
July 2008	007	Flow Rate			AF	7/16/2008
July 2008	007	Flow Rate			AF	7/23/2008
February 2008	008	Flow Rate			AD	2/5/2008
February 2008	008	Flow Rate			AD	2/12/2008
February 2008	008	Total Suspended Solids			AF	2/19/2008
February 2008	008	Flow Rate			AF	2/19/2008
February 2008	008	pH			AF	2/19/2008
February 2008	008	Zinc, Total Recoverabl			AF	2/19/2008
February 2008	008	Lead, Total Recoverabl			AF	2/19/2008
February 2008	008	Copper, Total Recovers			AF	2/19/2008
February 2008	008	Oil and Grease, Total			AF	2/19/2008
March 2008	008	Flow Rate			AD	3/4/2008
March 2008	008	Total Suspended Solids			AF	3/11/2008
March 2008	008	Flow Rate			AF	3/11/2008
March 2008	008	pH			AF	3/11/2008
March 2008	008	Zinc, Total Recoverabl			AF	3/11/2008
March 2008	008	Lead, Total Recoverabl			AF	3/11/2008
March 2008	008	Copper, Total Recovers			AF	3/11/2008
March 2008	008	Oil and Grease, Total			AF	3/11/2008
March 2008	008	Water Temperature			AF	3/11/2008
March 2008	008	Total Suspended Solids			AF	3/18/2008
March 2008	008	Flow Rate			AF	3/18/2008
March 2008	008	pH			AF	3/18/2008
March 2008	008	Zinc, Total Recoverabl			AF	3/18/2008

## Attachment 2: Reported "AF" and "AD" Codes (WCI Steel)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Date
March 2008	008	Lead, Total Recoverabl			AF	3/18/2008
March 2008	008	Copper, Total Recovers			AF	3/18/2008
March 2008	008	Oil and Grease, Total			AF	3/18/2008
March 2008	008	Water Temperature			AF	3/18/2008
March 2008	008	Total Suspended Solids			AF	3/25/2008
March 2008	008	Flow Rate			AF	3/25/2008
March 2008	008	pH			AF	3/25/2008
March 2008	008	Zinc, Total Recoverabl			AF	3/25/2008
March 2008	008	Lead, Total Recoverabl			AF	3/25/2008
March 2008	008	Copper, Total Recovers			AF	3/25/2008
March 2008	008	Oil and Grease, Total			AF	3/25/2008
March 2008	008	Water Temperature			AF	3/25/2008
January 2008	010	Flow Rate			AD	1/25/2008
January 2008	010	Flow Rate			AD	1/26/2008
January 2008	010	Flow Rate			AD	1/27/2008
January 2008	010	Flow Rate			AD	1/28/2008
January 2008	010	Flow Rate			AD	1/29/2008
January 2008	010	Flow Rate			AD	1/30/2008
January 2008	010	Flow Rate			AD	1/31/2008
February 2008	011	Flow Rate			AF	2/19/2008
February 2008	011	pH			AF	2/19/2008
February 2008	011	Oil and Grease, Total			AF	2/19/2008
March 2008	011	Flow Rate			AF	3/25/2008
March 2008	011	pH			AF	3/25/2008
March 2008	011	Oil and Grease, Total			AF	3/25/2008
March 2008	011	Water Temperature			AF	3/25/2008
February 2008	013	Flow Rate			AD	2/6/2008
February 2008	013	Flow Rate			AD	2/7/2008
February 2008	013	Flow Rate			AD	2/8/2008
February 2008	013	Flow Rate			AD	2/9/2008
February 2008	013	Flow Rate			AD	2/10/2008
February 2008	013	Flow Rate			AD	2/11/2008
February 2008	013	Flow Rate			AD	2/12/2008
February 2008	013	Flow Rate			AD	2/13/2008
February 2008	013	Flow Rate			AD	2/14/2008
February 2008	013	Flow Rate			AD	2/15/2008
February 2008	013	Flow Rate			AD	2/16/2008
February 2008	013	Flow Rate			AD	2/17/2008
February 2008	013	Flow Rate			AD	2/18/2008
February 2008	013	Flow Rate			AD	2/19/2008
February 2008	013	Flow Rate			AD	2/20/2008
February 2008	013	Flow Rate			AD	2/21/2008
February 2008	013	Flow Rate			AD	2/22/2008
February 2008	013	Flow Rate			AD	2/23/2008
February 2008	013	Flow Rate			AD	2/24/2008
February 2008	013	Flow Rate			AD	2/25/2008
February 2008	013	Flow Rate			AD	2/26/2008
February 2008	013	Flow Rate			AD	2/27/2008

## Attachment 2: Reported "AF" and "AD" Codes (WCI Steel)

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Date
February 2008	013	Flow Rate			AD	2/28/2008
February 2008	013	Flow Rate			AD	2/29/2008
March 2008	013	Flow Rate			AD	3/1/2008
March 2008	013	Flow Rate			AD	3/2/2008
March 2008	013	Flow Rate			AD	3/3/2008
March 2008	013	Flow Rate			AD	3/4/2008
March 2008	013	Flow Rate			AD	3/5/2008
March 2008	013	Flow Rate			AD	3/6/2008
March 2008	013	Flow Rate			AD	3/7/2008
March 2008	013	Flow Rate			AD	3/8/2008
March 2008	013	Flow Rate			AD	3/9/2008
March 2008	013	Flow Rate			AD	3/10/2008
March 2008	013	Flow Rate			AD	3/11/2008
March 2008	013	Flow Rate			AD	3/12/2008
March 2008	013	Flow Rate			AD	3/13/2008
March 2008	013	Flow Rate			AD	3/14/2008
March 2008	013	Flow Rate			AD	3/15/2008
March 2008	013	Flow Rate			AD	3/16/2008
March 2008	013	Flow Rate			AD	3/17/2008
March 2008	013	Flow Rate			AD	3/18/2008
March 2008	013	Flow Rate			AD	3/19/2008
March 2008	013	Flow Rate			AD	3/20/2008
March 2008	013	Flow Rate			AD	3/21/2008
March 2008	013	Flow Rate			AD	3/22/2008
March 2008	013	Flow Rate			AD	3/23/2008
March 2008	013	Flow Rate			AD	3/24/2008
March 2008	013	Flow Rate			AD	3/25/2008
March 2008	013	Flow Rate			AD	3/26/2008
March 2008	013	Flow Rate			AD	3/27/2008
March 2008	013	Flow Rate			AD	3/28/2008
March 2008	013	Flow Rate			AD	3/29/2008
March 2008	013	Flow Rate			AD	3/30/2008
March 2008	013	Flow Rate			AD	3/31/2008