



Environmental
Protection Agency

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

January 11, 2011

RE: Trumbull County
Thomas Steel Strip Corp.
NPDES Permit No. OH0011363
Ohio EPA Permit No. 31C00056
Compliance Evaluation Inspection

Mr. Mark Grabigel, Environmental Affairs & Utilities Manager
Thomas Steel Strip Corporation
Delaware Avenue, N.W.
Warren, Ohio 44485

Dear Mr. Grabigel:

Please find enclosed a copy of the laboratory data compiled by Ohio EPA for the samples collected on November 1-2, 2010 of the wastewater treatment system(s) serving Thomas Steel Strip. During the course of the visit, 24-hour composite and grab samples were collected of the final effluent discharge at Outfall 001. In addition, upstream and acute mixing zone samples were collected in the Mahoning River. The samples were split with the facility and analyzed by Ohio EPA for the routine permit parameters, organic constituents, and biological toxicity. In addition to evaluating compliance with the existing NPDES permit, the information gathered by Ohio EPA will be utilized during future NPDES permit renewal processes.

NPDES Permit Status/Facility Description:

Thomas Steel Strip operates a metal finishing operation at the referenced site. It was noted that Thomas Steel's parent company, the Corus Group, officially changed its name to Tata Steel Europe in September 2010 and adopted the Tata corporate identity.

Production operations at the facility include, among other things, acid pickling, cold rolling mills, temper mills, and electroplating lines. Process wastewaters generated by these operations are subject to Federal Effluent Guideline Limitations contained in 40 CFR 120.102 and 120.103 (Iron and Steel Manufacturing) and 40 CFR 433.13 and 433.14 (Metal Finishing). Process flows are treated via a chemical neutralization/ precipitation process (Internal Monitoring Station 601). The combined plant flows, including stormwater, are processed through an oil/water separator prior to discharging at Outfall 001 to the Mahoning River (via the Dickey Run storm sewer).

The current NPDES permit, issued with a modification date of September 1, 2009, expires on July 31, 2013. The permit required Thomas Steel to submit an engineering evaluation of its existing wastewater treatment system(s) by no later than August 1, 2010. The required report was submitted within the permit schedule.

Inspection Findings:

At the time of the inspection, the following observations, findings and/or comments were noted:

1. You noted that Thomas Steel's parent company, the Corus Group, officially changed its name to Tata Steel Europe in September 2010 and adopted the Tata corporate identity.

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2. The general operation and maintenance of the 601 and 001 treatment systems appeared to be satisfactory. There was no visual evidence of excessive suspended solids or oil and grease being discharged to "waters of the state" at Outfall 001.
3. You indicated that the Copper-Brass line would likely not be restarted.
4. The Ohio EPA bioassay data revealed that the Outfall 001 composite sample was acutely toxic to the one of the two test organisms, *Ceriodaphnia dubia*. However, the reported level of 2.5 TUa is within the limitations set by the NPDES permit. No adverse acute effects were observed in the Mahoning River upstream water sample or the laboratory controls. Additionally, the chemical-specific data did not indicate any violations of the existing final effluent limitations.

Discharge Monitoring Reports (DMR):

Discharge monitoring reports (DMR) received by Ohio EPA for the period, June 2009 – December 2010, were reviewed. A summary of the discharge data is listed in Attachment A. The review noted violations of the terms and conditions of the NPDES permit. The specific instances of non-compliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2010	001	pH	1D Conc	9.5	10.8	4/6/2010

Summary:

Please be advised that failure to comply with the terms and conditions of the NPDES permit may be cause for enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. It is requested that you inform this office, in writing, within 10 days of receipt of this notification as to the actions that have been or will be taken to address the above violations.

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

Enclosure: Bioassay Report

File: Industrial/Thomas Steel Strip/Permit-Compliance

Attachment A: NPDES Permit No. 3IC00056 DMR Summary (6/2009 – 12/2010)

Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 th	95 th	
Outfall 001						
Water Temperature	Annual	C	76	22	30	8-34
pH	Annual	S.U.	152	8.55	9.2	6.8-10.8
Residue, Total Dissolved	Annual	mg/l	76	1250	1900	250-2300
Total Suspended Solids	Annual	mg/l	76	3	7.25	1-10
Oil and Grease	Annual	mg/l	76	1	3.1	0.1-3.8
Nitrogen, Ammonia (NH ₃)	Summer	mg/l	88	0.0955	0.331	0.013-0.477
Nitrogen, Ammonia (NH ₃)	Winter	mg/l	64	0.132	0.463	0.011-0.571
Cyanide, Free	Annual	mg/l	152	0	0.0218	0-0.038
Boron, Total Recoverable	Annual	ug/l	20	1870	5300	246-6320
Copper, Dissolved (Cu)	Annual	ug/l	76	8	14	0-21
Nickel, Total Recoverable	Annual	ug/l	76	90	389	16-2310
Zinc, Total Recoverable	Annual	ug/l	76	30	70.5	10-115
Lead, Total Recoverable	Annual	ug/l	71	2	38.5	0-44
Chromium, Total Recoverable	Annual	ug/l	70	0	30	0-37
Copper, Total Recoverable	Annual	ug/l	76	11.5	18.5	0-22
Chloroform	Annual	ug/l	20	7.25	11	0-11
Oxidants, Total Residual	Annual	mg/l	73	0	0	0-0
Flow Rate	Summer	MGD	337	0.514	0.806	0.181-1.1
Flow Rate	Winter	MGD	242	0.397	0.785	0.154-1.77
Flow Rate	Annual	MGD	579	0.465	0.798	0.154-1.77
Chlorine, Total Residual	Annual	mg/l	76	0	0	0-0
Mercury, Total (Low Level)	Annual	ng/l	7	2.1	3.82	1.5-4.3
Acute Toxicity, <i>C. dubia</i>	Annual	TUa	7	0	1.12	0-1.3
Chronic Toxicity, <i>C. dubia</i>	Annual	TUc	7	1.4	2.38	0-2.8
Acute Toxicity, <i>P. promelas</i>	Annual	TUa	7	0	0	0-0
Chronic Toxicity, <i>P. promelas</i>	Annual	TUc	7	0	0	0-0
Station 601						
pH	Annual	S.U.	152	8.8	9.3	7-10.8
Total Suspended Solids	Annual	mg/l	76	5	9.25	1-25
Oil and Grease, Total	Annual	mg/l	76	1.2	3.1	0-4.4
Chromium, Total (Cr)	Annual	ug/l	67	0	44.4	0-182
Nickel, Total Recoverable	Annual	ug/l	152	146	711	0-2940
Zinc, Total (Zn)	Annual	ug/l	152	40	162	4-559
Copper, Total Recoverable	Annual	ug/l	152	12	25	0-58
Flow Rate	Summer	MGD	337	0.211	0.383	0.001-0.499
Flow Rate	Winter	MGD	242	0.154	0.393	0.001-0.49
Flow Rate	Annual	MGD	579	0.172	0.388	0.001-0.499
Station 603						
Cyanide, Amenable to	Annual	mg/l	11	0.056	0.125	0-0.15

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Parameter	Season	Units	# Obs.	Percentiles		Data Range
				50 th	95 th	
Chlorination						
Flow Rate	Summer	MGD	9	0.001	0.006	0.001-0.006
Flow Rate	Winter	MGD	3	0.002	0.0101	0.002-0.011
Flow Rate	Annual	MGD	12	0.002	0.00825	0.001-0.011
Station 801						
Oxidants, Total Residual	Annual	mg/l	1	0	0	0-0
48-Hr. Acute Toxicity, <i>C. dubia</i>	Annual	% Affected	7	0	0.001	0-0.001
96-Hr. Acute Toxicity, <i>P. promelas</i>	Annual	% Affected	7	0	0.001	0-0.001
7-Day Chronic Toxicity, <i>C. dubia</i>	Annual	% Affected	7	0	0.001	0-0.001
7-Day Chronic Toxicity, <i>P. promelas</i>	Annual	% Affected	7	2	12	0-15