



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 6, 2009

RE: TRUMBULL COUNTY
THOMAS STEEL STRIP CORP.
NPDES PERMIT NO. OH0011363
OHIO EPA PERMIT NO. 3IC00056
COMPLIANCE EVALUATION INSPECTION

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

Dear Mr. Grabigel:

On June 23, 2009, a Compliance Evaluation Inspection was conducted at the above-referenced facility. The purpose of the inspection was to evaluate the facility's compliance status with the terms and conditions of the NPDES permit.

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

1. Due to the current economic downturn, you indicated that the facility has been operating at approximately 60 – 70 % of normal capacity.
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 Awaters of the state@ at Outfall 001.
3. A new Yokagawa pH recorder had been installed at Station 601. The new unit allows for real-time access and downloading to a personal computer.
4. You indicated that the Copper-Brass line has not been in operation since March 2008.
5. The SWPPP was updated and signed on April 4, 2009. The last annual audit was performed on October 10, 2008. All remedial items identified were completed within the prescribed 90-day timeline.
6. With respect to the facility laboratory, we discussed the need to develop an updated Method Detection Limit (MDL) study for the respective permit parameters. The MDL procedure is listed in 40 CFR 136 Appendix B.

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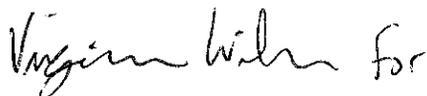
A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period August 2008 through May 2009 indicates violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	001	Acute Toxicity, Ceriod	1D Conc	2.5	3.7	12/16/2008

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

File: Industrial/Thomas Steel Strip/Permit-Compliance