



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

November 28, 2007

RE: UNITES STATES STEEL CORP.
LORAIN TUBULAR OPERATIONS
PERMIT NO. 31D00074
LORAIN COUNTY

Mr. John W. Bilz
Department Manager
Maintenance & Environmental
U.S. Steel Tubular Products
2199 East 28th Street
Lorain, OH 44055

Dear Mr. Bilz:

On October 30, 2007, an inspection of the above referenced facility's wastewater treatment system and storm water outfalls was conducted. The facility was represented by Ms. Kelly Cernanec, Environmental Engineer, and you. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit.

The following items were noted/discussed since the last inspection:

1. Guardian Environmental remains the contractor which performs weekly inspections of the pipe mill lagoon outfall and is responsible for replacing the oil booms as needed.
2. No oil sheen was observed at the pipe mill lagoon. However, isolated oil sheens were observed in the cove at the discharge. No oil sheen was observed in the Black River.
3. NPW remains the contractor which uses a vacuum truck to remove accumulated oil floating on the pipe mill lagoon as needed.
4. Lorain Tubular plans to dredge the pipe mill lagoon sometime in 2008.
5. Lorain tubular intends to collect core samples in the next couple of weeks. The material will either be recycled or sent to a landfill.
6. Outfalls 31D00074002 and 31D00074003 are storm water outfalls associated with the D-2 landfill. No discharge was observed at outfall 31D00074002. Outfall 31D00074003 had a slight discharge. The discharge was clear.
7. Outfalls 31D00074004 and 31D00074005 are storm water outfalls associated with the East Storage Area. These outfalls are impacted by groundwater. No visual impact was observed at these outfalls.
8. Veolia Water Systems operates/maintains the D-2 landfill. The treated effluent from the D-2 landfill discharges through outfall 31D00074001. No discharge was occurring during the inspection. Ms. Cernanec indicated the typical flow is 2 gallons/minute.
9. Groundwater seeps from the D-2 landfill were observed along the Black River.
10. A pilot pump test for the D-2 landfill seeps was conducted by Michael Baker Jr. Inc. It was anticipated achieving a pumping yield of 0.5 gallons per minute. However, at two feet below grade a pumping yield of 66.0 gallons per minute was achieved. Currently, the project is being reevaluated based on the flow incurred.

Mr. John W. Bilz
U.S. Steel Tubular Products
November 28, 2007
Page 2

11. American Testing Company performs all of the analytical testing for the facility and is also responsible for submitting the data to Ohio EPA through the Division's Surface Water Management System, (SWIMS).

This office has recently reviewed your self-monitoring reports covering the period January 1, 2006, through September 30, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
006	00550	Oil and Grease, Total	1D Qty	84.1	85.7529	9/28/2006
001	00552	Oil and Grease, Hexane	1D Conc	10	19.1	10/17/2006
006	00530	Total Suspended Solids	30D Qty	126	134.405	8/1/2007

CODE VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	50050	Flow Rate			AD	4/3/2006
001	50050	Flow Rate			AD	4/4/2006
001	50050	Flow Rate			AD	4/5/2006
001	50050	Flow Rate			AD	4/6/2006
001	50050	Flow Rate			AD	4/7/2006
001	50050	Flow Rate			AD	4/8/2006
001	50050	Flow Rate			AD	4/9/2006

No frequency violations were noted.

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

Michael W. Stevens

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt