

**Environmental  
Protection Agency**

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

July 18, 2011

**Re:** Belmont County  
RG Steel Wheeling, LLC  
formerly Severstal & Wheeling Pittsburgh Steel  
Martins Ferry Plant  
NPDES Permit OIC00020\*DD  
Compliance Evaluation Inspection  
Correspondence (IWW)

Mr. Bud Smith  
RG Steel Wheeling, LLC  
1134 Market Street  
Wheeling, WV 26003

Dear Mr. Smith:

On May 24, 2011, I conducted a compliance evaluation inspection (CEI) at the RG Steel Wheeling Martins Ferry plant. Pat Smith represented the RG Steel Wheeling during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, Federal Number OH0011339, State Number OIC00020\*CD, and the 2003 Consent Order for Preliminary Injunction (COPI). A copy of the inspection report form is attached.

The following comments/problems were noted as a result of the inspection:

1. The NPDES permit is expired. The facility applied for renewal prior to expiration, and the permit has been transferred from Severstal to RG Steel. The permit is in the process of being drafted.
2. Ohio EPA is currently engaged in enforcement action against the company for outstanding non-compliance issues.
3. Part I, A of the NPDES Permit – Effluent Violations: Since January 2009, the facility has violated the effluent limitations on these occasions at outfall 001:

Month/Year	Parameter	Type	Limit	Reported	Date
February 2009	pH, Maximum	1D Conc	10	10.1	2/6/2009
June 2009	Zinc, Total (Zn)	30D Conc	505	1004.9	6/1/2009
June 2009	Zinc, Total (Zn)	30D Qty	1.19	12.0	6/1/2009
June 2009	pH, Maximum	1D Conc	10	10.2	6/6/2009
June 2009	pH, Maximum	1D Conc	10	10.1	6/7/2009
June 2009	pH, Maximum	1D Conc	10	10.1	6/8/2009

Month/Year	Parameter	Type	Limit	Reported	Date
June 2009	Zinc, Total (Zn)	1D Conc	910	6870	6/17/2009
June 2009	Zinc, Total (Zn)	1D Qty	2.53	14.6	6/17/2009
June 2009	pH, Maximum	1D Conc	10	11.5	6/18/2009
June 2009	pH, Maximum	1D Conc	10	10.4	6/19/2009
June 2009	pH, Maximum	1D Conc	10	10.3	6/23/2009
August 2009	Zinc, Total (Zn)	1D Conc	910	1315	8/25/2009
September 2010	Zinc, Total (Zn)	1D Conc	910	1090	9/8/2010
September 2010	Zinc, Total (Zn)	1D Conc	910	1280	9/16/2010
October 2010	Zinc, Total (Zn)	1D Conc	910	1500	10/7/2010
October 2010	pH, Maximum	1D Conc	10	11	10/9/2010

According to the reports, these violations are attributable to operation and maintenance problems, which are preventable. What steps will be taken to prevent future violations? Every effort must be made to comply with the effluent limits contained in the NPDES permit.

4. Part III of the NPDES Permit – Unauthorized Discharges

There have been no reported unauthorized bypasses (outfall 602) from the influent sump since January 2010.

WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall.

5. Part I,C,3 of the NPDES permit and paragraph 13 of the 2003 Consent Order for Preliminary Injunction (COPI) – Sampling Location

- a. The NPDES permit and the COPI require the facility after 11/1/2004 to sample the final effluent at a sampling and flow meter station at a location after the WWTP effluent line (outfall 601) and the influent sump bypass (outfall 602) re-combine. Sometime after the floods of the fall of 2004, the facility revised the sampling location for the final discharge to the location of 601 at the clarifier effluent. This is an unauthorized location for the sampling of this outfall. The facility is in violation of both the NPDES permit and the COPI for revising the sampling location. The facility must sample in accordance with the NPDES permit and the COPI until the permit is modified to re-designate the outfall location.
- b. WPS submitted a Permit to Install for a new flow monitoring and sampling station for the influent sump bypass (outfall 602). At a recent meeting with you, you indicated that the facility may not be interested in following through with this PTI. Please submit a written request to withdraw the PTI if you no longer wish for it to be processed.

6. Part I, C of the NPDES Permit – Compliance Schedules

The NPDES permit contains a compliance schedule for the facility to meet Whole Effluent Toxicity (WET) limits by 2/1/07. The facility has submitted a Mixing Zone Plan and an NPDES permit modification requesting an increase in the toxicity limit. The facility has submitted a PTI application for installation of a diffuser to aid in compliance with the revised limitations as soon as the NPDES permit renewal is issued.

7. Part III, Item 3 of the NPDES Permit – Operation and Maintenance

- a. During this inspection it was noted that the amount of oil and grease present in the influent wet well has been significantly reduced.
- b. If the staffing level at the WWTP is reduced in the future please notify Ohio EPA of the change.
- c. Provide a date when the flow meters were calibrated.

Please respond to comments 3,5 and 7b and c above, in writing, within 30 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284 at your convenience.

Sincerely,



Ms. Abbot Stevenson  
Environmental Engineer  
Permits and Enforcement Section  
Division of Surface Water

AS/dh

Enclosure

c: Rachel DeMuth, DSW, CO  
c: Brian Ball, AGO

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIC00020*DD	OH0011339	May 24, 2011	C	S	2

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
RG Steel Wheeling, LLC Martins Ferry Plant 1001 Main Street Martins Ferry, Ohio	10:15 a.m.	August 1, 2004
	Exit Time	Permit Expiration Date
	1:00 p.m.	January 31, 2009

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Pat Smith, Environmental Manager	(304) 234-2662
Lenny Vinci, Division Manager (at Martins Ferry Plant but not avail. day of inspection)	(304) 234-7291
Name, Address and Title of Responsible Official	Phone Number
Bud Smith RG Steel Wheeling LLC 1134 Market Street Wheeling, WV 26003	(304) 234-2662

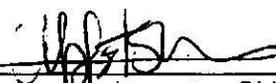
**C. AREAS EVALUATED DURING INSPECTION**

<u>U</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>NE</u> Laboratory	<u>U</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>U</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>    </u> Other
<u>NA</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

**D. SUMMARY OF FINDINGS/COMMENTS** (attach additional sheets if necessary)

1. Permit - Permit needs to be updated through renewal. Production rates are significantly reduced. See letter Item.
2. O&M and effluent limitations - effluent violations due to operator issues??? See letter Item
3. Compliance Schedule - See letter Items and
4. Self Monitoring - Outfall 001 is not sampled at the permitted location. See letter Item

  
Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

Date 7/18/11

  
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

Date 7/18/11

**E. PERMIT VERIFICATION**

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)		X		
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection	X			
g. Notification given to state of new, different, or increased discharges	X			
h. All discharges are permitted		X		
i. Number and location of discharge points are as described in permit		X		

**Comments:** c. Production has significantly reduced since the permit was issued.  
 h. Flow discharged over the weir wall is a bypass of treatment.

**COMPLIANCE SCHEDULES/VIOLATIONS**

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: <u>NPDES Permit</u>	X			
e. Permittee is meeting compliance schedule		X		

**Comments:** e. Permittee complied with sampling station requirements, then returned to non-compliance by moving the sampling stations.

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u>X</u> Dual Feed _____	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts <u>3</u> Days/Week <u>7</u>	X			
e. Operator holds unexpired license of class required by permit Class: _____			X	
f. Routine and preventive maintenance schedule/performed on time*	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained			X	
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

**Comments:** d. If the facility reduces the hours of the staff at the WWTP Ohio EPA should be notified that coverage is not provided 24/7.  
 i. It appears that the number of bypasses has reduced since the weir wall was raised.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: ____%			X	
b. Any collection system overflows since last inspection (CSO ____ SSO ____)				
c. Regulatory agency notified of overflow (SSOs)				
d. CSO O and M plan provided and implemented				
e. CSOs monitored and reported in accordance with permit				
f. Portable pumps used to relieve system				
g. Lift station alarm systems provided and maintained				
h. Are lift stations equipped with permanent standby power or equivalent				
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection				
j. Any complaints received since last inspection of basement flooding				
k. Are any portions of the sewer system at or near capacity				

Comments:

## H. SLUDGE MANAGEMENT

	Yes	No	N/A	N/E
a. Sludge Management Plan current			X	
b. Sludge adequately disposed (Method: <u>Landfill</u> )	X			
c. If sludge is incinerated, where is ash disposed of? _____			X	
d. Is sludge disposal contracted (Name: <u>Short Creek LF in WV</u> )	X			
e. Has amount of sludge generated changed significantly since last inspection		X		
f. Adequate sludge storage provided at plant	X			
g. Land application sites monitored and inspected per SMP			X	
h. Records kept in accordance with state and federal law	X			
i. Any complaints received in last year regarding sludge		X		
j. Is sludge adequately processed (digestion, dewatering, pathogen control)			X	

Comments:

## I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: <u> X </u> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir _____ Specify: _____	X			
b. Calibration frequency adequate: date of last calibration: <u>Unknown at the time of insp.</u>		X		
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d. Flow measurement equipment adequate to handle expected ranges of flows	X			
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: <u> X </u> Daily _____ Weekly _____ Monthly _____ Other				



**K. MULTIMEDIA OBSERVATIONS**

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities*		X		

**If any of the above are observed, ask the following questions:**

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

**Comments:** Mill yard appears cleaner. Totes are no longer being stored outside.