



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 30, 2008

Re: Jefferson County
Wheeling Pittsburgh Steel, South Plant
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Bud E. Smith, Director, Env. Control
Wheeling Pittsburgh Steel
1134 Market Street
Wheeling, WV 26003

Dear Mr. Smith:

On April 9, 2007, Ohio EPA conducted a Compliance Evaluation Inspection at the Wheeling Pittsburgh Steel Corporation (WPS) South Plant in Mingo Junction. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01D00034*FD (Effective date of 11/01/06) and to evaluate the wastewater treatment systems performance. Mr. Jim Lewis and Mr. Mark Vignovic were present during the inspection.

Based on review of records since March 1, 2007, Wheeling Pittsburgh Steel South Plant was found to have reported the following limit violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2007	005	00400	pH	1Day Conc.	9	9.8	4/3/07
April 2007	005	01094	Zinc, Total Recoverable	1Day Conc.	290	600.	4/11/07
May 2007	005	01094	Zinc, Total Recoverable	1Day Conc.	290	310.	5/30/07
November 2007	008	00400	pH	1Day Conc.	9	9.1	11/6/07
November 2007	011	00400	pH	1Day Conc.	9	9.8	11/6/07
January 2008	005	01094	Zinc, Total Recoverable	1Day Conc.	290	335.	1/4/08

The permit 01D00034*FD requires the permittee to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C. Our office is not being notified as required by the permit of the numerical violations. I would like to be notified of who the company is putting or has put in charge of making this notification. Failure to report is a violation of the permit and subjects you to significant monetary penalties.

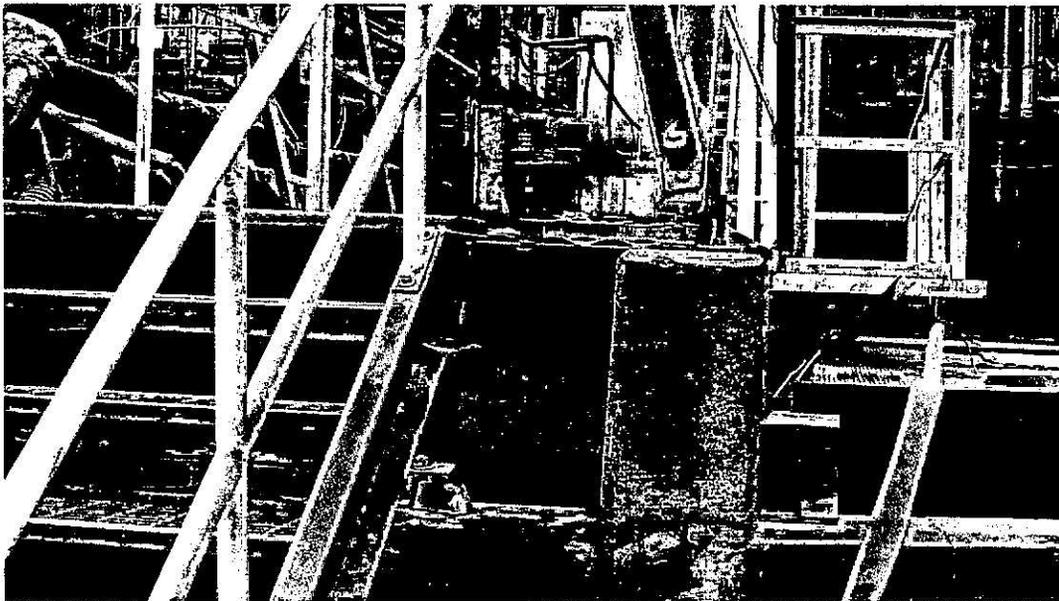
Our files also show that correspondence was received describing the following events:

- Anticipated bypass of the continuous caster effluent outfall 606 directly to outfall 007 due to a maintenance outage at the 80 inch Hot strip Mill for 7/13/07 thru 7/31/07.

- A sheen incident at 603 in route to 007 on 1/10/08.
- A sheen incident at 007 on 1/24/08.
- A discoloration incident at 005 on 1/25/08.
- A sheen incident at 007 on 2/4/08.

We also received information on 11/7/07 regarding the planned shutdown of the BOF which would eliminate 605 and 005. During the inspection, one of the two BOF vessels was in operation. The operation of the BOF was expected to continue and possibly expand to get both vessels in operation. The current permit has a compliance schedule for outfall 005 in Part I. C.1. The milestone for PTI application submittal at 005 was due 11/1/07 with approved plans required by 11/1/08. Therefore the first milestone has been exceeded by approximately 180 days. A Permit to Install application needs submitted as soon as possible. In your response to this letter, please provide the information required by Part III, Item 12(D).

During the inspection, we noticed that the BOF EIMCO 40 foot thickener was being overwhelmed with sludge as shown here.



Jim spoke with the EIMCO WWTP operator and had the tank float with the 50 foot thickener to help alleviate the loading of solids. The BOF sludge dump tank reportedly had two low service pumps down and high service pumps were being used to transport the fluids. The outfall at 605 did not seem effected at the time of the inspection.

All visual inspections of the outfalls reported clear effluents with the exception of discoloration at 018 which is commonly associated with Acid Mine Drainage from off site.

During the inspection, I wanted to convey that this facility and the other facilities' production records will need reviewed closely to identify if tiered limits may be needed. Operations at some of the facilities such as North and Martins Ferry have reportedly been reduced. Development of tiered limits would not restrict the levels of production. Instead various levels of production would be given appropriate loading limits per Technology Based Effluent Limits.

Sanitary leaving the facility enters the Mingo Junction's wastewater collection system to be treated at their WWTP. Their WWTP permit renewal is currently being reviewed and the plant experiences warm low strength influent and approximately 300,000 to 400,000 gpd more than typical for a WWTP serving a community its size. During the inspection, we viewed the sanitary discharge which was relatively warm and clear and considerable in flow rate. Jim and Mark made a good point that we were viewing this discharge right around the time of a shift change which could mean that 500 plus showers were in use. However, we would like you to review metered data at the sanitary metering station and provide a description of the nature of the wastewater (whether or not there is any cooling water).

Please provide comments to our office within 14 days of receipt of this correspondence with regards to the underlined portions of this letter and any other portions you desire.

Additionally, a copy of our inspection report is enclosed along with a CD containing copies of pictures taken onsite. The assistance and cooperation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AMP/dh

Enclosure

- c: Jim Lewis, Wheeling Pittsburgh Steel – South
- c: Mark Vignovic, Wheeling Pittsburgh Steel – South

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No. OID00034*FD	NPDES No. OH0011355	Date April 9, 2008	Inspection Type C	Inspector S	Facility Type 2
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B. FACILITY DATA

Name and Location of Facility Inspected Wheeling Pittsburgh Steel Corp., South Plant McLister Avenue Mingo Junction, Ohio	Entry Time 10:00 a.m.	Permit Effective Date November 1, 2006
	Exit Time 5:15 p.m.	Permit Expiration Date March 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mark Vignovic	(740) 283-5459
Jim Lewis	(740) 283-5873 (740) 278-2184 (Cell)
Name, Address and Title of Responsible Official	Phone Number
Bud E. Smith, Director Environmental Control 1134 Market Street Wheeling, WV 26003	304-234-2662

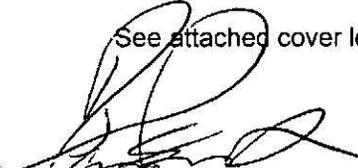
C. AREAS EVALUATED DURING INSPECTION

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

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

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

See attached cover letter



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

4-14-08

Date



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

4/30/08

Date

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			

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection (See attached Cover Letter)	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>				
e. Permittee is meeting compliance schedule		X ¹		

¹There is a schedule to fall into compliance with zinc and lead at 005 that has passed. Previously it was conveyed to the agency that the source from the BOF would be eliminated with a future shutdown of the BOF. The BOF operation is still existing and expected to continue as reported during the inspection. Thus this compliance milestone needs promptly addressed.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator <u> </u> Dual Feed <u>X</u>	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> 24hrs/day				
e. Operator holds unexpired license of class required by permit Class: <u> </u>			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 ¹
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses <u> </u> on MORS <u> </u> 800 Number		X		
k. Any hydraulic and/or organic overloads experienced since last inspection				X

Comments: ¹Computer program - Tabware - is used to initiate needed maintenance. Contracted Operations.

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP):

_____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X N/A

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

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: _____ ultrasonic & parshall flume calculated from influent _____ weir X Other _____ ultrasonic & weir Specify: <u>Various</u>				X
b. Calibration frequency adequate (date of last calibration <u>Bi-yearly</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: X Daily Weekly Monthly Other				

Part 2, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)				X
b. If alternate analytical procedures are used, proper approval has been obtained			X	
c. Analyses being performed more frequently than required by permit	X			
d. If (c) is yes, are results reported in permittee's self-monitoring report				X
e. Commercial laboratory used 1. Parameters analyzed by commercial lab: <u>ALL but inhouse Temp, pH, flow, etc.</u> 2. Lab name: <u>Pace Analytical</u>	X			

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
f. Quality assurance manual provided and maintained							X
g. Satisfactory calibration and maintenance of instruments and equipment							X
h. Adequate records maintained							X
i. Results of latest U.S. EPA quality assurance performance sampling program:							
Date: 8-31-07		X		Satisfactory, except for pH – a follow up letter stated the probe was replaced as a corrective action.			

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
003	none	none	none	none	none	clear	
004	none	none	none	none	none	clear	
005	none	none	none	none	none	clear	
007	none	none	none	none	none	clear	
008	none	none	none	none	none	clear	
018	none	none	Acid Mine Drainage?	none	none	red	
601	none	none	none	none	none	clear	
605	none	none	none	none	none	clear	