



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
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March 17, 2010

Re: Jefferson County
Severstal Wheeling, Inc.
Mingo Junction Plant (South)
Correspondence (IWW)

Mr. Bud E. Smith, Director, Env. Control
Severstal Wheeling, Inc.
1134 Market Street
Wheeling, WV 26003

Dear Mr. Smith:

On March 3, 2010, Ohio EPA conducted a Compliance Evaluation Inspection at the Severstal Wheeling, Inc., Mingo Junction Plant (South) in Jefferson County. 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).

The following list summarize permit limit exceedences which have occurred since the previous inspection on April 9, 2008:

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-------------------------|------------|-------|----------------|----------------|
| 004 | 00400 | pH | 1D Conc | 9 | 9.3 | 9/3/2008 |
| 004 | 00400 | pH | 1D Conc | 9 | 9.5 | 10/14/2008 |
| 005 | 00400 | pH | 1D Conc | 6 | 5.1 | 7/29/2008 |
| 005 | 01094 | Zinc, Total Recoverable | 1D Conc | 290 | 880. | 10/21/2008 |
| 601 | 32730 | Phenolic 4AAP, Total | 30D Qty | 0.11 | .12837 | 8/1/2008 |
| 601 | 32730 | Phenolic 4AAP, Total | 1D Qty | 0.22 | .25674 | 8/12/2008 |

Permit 01D00034*FD requires the Owner to report non-compliance as directed by Part III.12.E which shall contain information listed in Part III.12.B and Part III.12.C. No correspondence for the above listed pH and Phenolics non-compliance was located during my recent compliance review. I had received notification with regards to the 005 Zinc non-compliance value.

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 ¹ | | |
| d. Flows and loadings conform with NPDES permit | | X ¹ | | |
| e. Treatment processes are as described in permit application/briefing memo | X ² | | | |
| f. New treatment process(es) added since last inspection | | X | | |
| g. Notification given to state of new, different, or increased discharges | X ³ | | | |
| h. All discharges are permitted | X | | | |
| i. Number and location of discharge points are as described in permit | X | | | |

Comments: ¹No production is occurring. The facility is being idled.
²No water treatment is occurring during the idling.
³The agency was notified about the idling of the plant

F. COMPLIANCE SCHEDULES/VIOLATIONS

| | Yes | No | N/A | N/E |
|---|----------------|----|-----|-----|
| a. Any significant violations since the last inspection on <u>April 9, 2008</u> | X ¹ | | | |
| b. Permittee is taking actions to resolve violations | X | | | |
| c. Permittee has compliance schedule | X | | | |
| d. Compliance schedule contained in: <u>Permit</u> | X | | | |
| e. Permittee is meeting compliance schedule | X ² | | | |

Comments: ¹See attached cover letter – various limit violations at 004, 005, and 601 from late 2008.
²The compliance schedule associated with 005 is pending on a PTI approval of an application received.

G. OPERATION AND MAINTENANCE

| Treatment Facility Properly Operated and Maintained | Yes | No | N/A | N/E |
|---|-----|----------------|-----|-----|
| a. Standby power available: Generator <u>Dual Feed</u> <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 ¹ | | |
| d. Sufficient operating staff provided: # of shifts <u>7</u> Days/Week | | | 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 <u>800</u> Number | | | X | |
| k. Any hydraulic and/or organic overloads experienced since last inspection | | | | X |

Comments: ¹No units in service, production has been idled.

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

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 N/A

| | Yes | No | N/A | N/E |
|---|-----|----|-----|----------------|
| b. Sludge Management Plan current | | | X | |
| c. Sludge adequately disposed (Method: Landfill and recycle) | X | | | |
| d. If sludge is incinerated, where is ash disposed of? | | X | | |
| e. Is sludge disposal contracted | | | | X |
| f. Has amount of sludge generated changed significantly since last inspection | | | | X ¹ |
| 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 (dewatering) | X | | | |

Comments: ¹No sludge is being generated during idling.

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: <input checked="" type="checkbox"/> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other <input checked="" type="checkbox"/> ultrasonic & weir _____ Specify: | | | X | |
| b. | Calibration frequency adequate – plant has been idled for months – would need calibrated upon plant startup. | | | | 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: _____ Daily _____ Weekly _____ Monthly <input checked="" type="checkbox"/> Other (being idled) | | | | |

| Part 2 - Sampling | | Yes | No | N/A | N/E |
|--------------------------|---|------------|-----------|------------|------------|
| a. | Sampling location(s) are as specified by permit | X | | | |
| b. | Parameters and sampling frequency agree with permit (no flow at various outfalls) | X | | | |
| c. | Permittee uses required sampling method | X | | | |
| d. | Sample collection procedures are adequate | | | | X |
| i. | Samples refrigerated during compositing | | | | X |
| ii. | Proper preservation techniques used | X | | | |
| | Conform with 40 CFR 136.3 | | | | |
| e. | Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records) | X | | | |
| f. | Adequate records maintained of sampling date, time, exact location, etc. | X | | | |

| Part 3, 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 except pH, flow, and temp.</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: <u>Study 29</u> <input checked="" type="checkbox"/> Satisfactory _____ Marginal _____ Unsatisfactory | | | | |

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

| Outfall # | Oil Sheen | Grease | Turbidity | Visible Foam | Visible Float Solids | Color | Other |
|-----------|-----------|--------|-----------|--------------|----------------------|-------|-------|
| 603 | No flow | | | | | | |
| 605 | No flow | | | | | | |