



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

February 14, 2008

Re: Jefferson County
Wheeling Pittsburgh Steel
Yorkville Plant
Compliance Evaluation Inspection
Correspondence (IWW/Major)

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

Dear Mr. Smith:

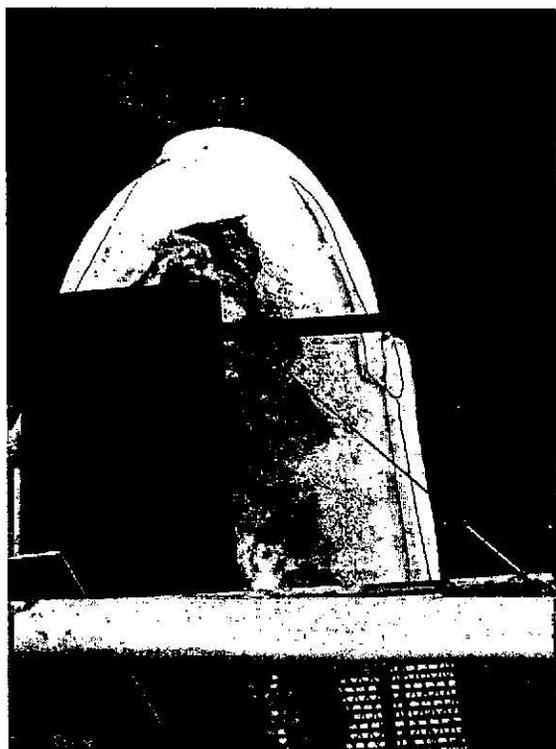
On September 10 and 11, 2007, Ohio EPA conducted a Compliance Sampling Inspection at the Wheeling Pittsburgh Steel Corporation (WPS) Yorkville Plant in Jefferson County. We followed up on September 19, 2007 with a walkthrough of the facility. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01D00035*ED (effective date of 8/01/04) and to evaluate the wastewater treatment systems performance. Mr. Tom Waligura and Jim Lewis were present during the inspection.

The following list summarizes limit violations which have been reported since 3/1/06:

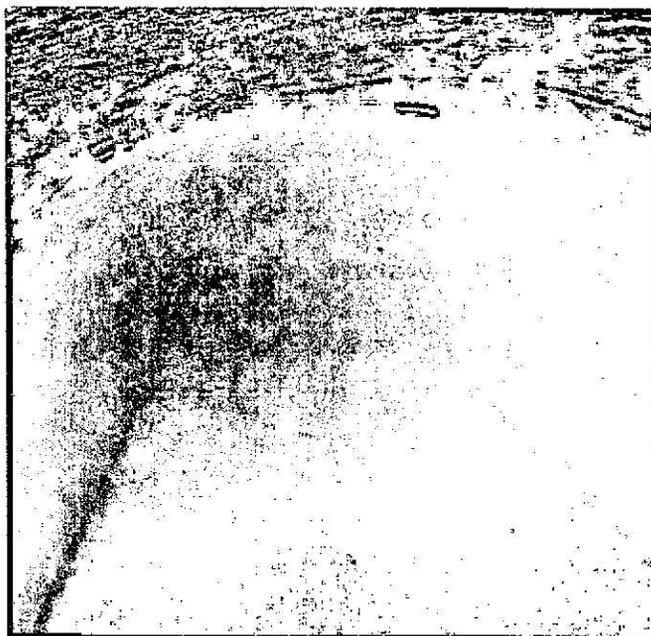
Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2006	002	00550	Oil and Grease, Total	1D Conc	20	33.3	5/10/06
June 2006	002	00550	Oil and Grease, Total	1D Conc	20	51.3	6/28/06
August 2006	002	00400	pH	1D Conc	6.0	2.8	8/23/06
August 2006	002	00400	pH	1D Conc	6.0	2.7	8/30/06
October 2006	002	00400	pH	1D Conc	6.0	2.	10/4/06
October 2006	002	00400	pH	1D Conc	6.0	2.	10/11/06
October 2006	002	00400	pH	1D Conc	6.0	2.	10/18/06
Nov. 2006	003	00550	Oil and Grease, Total	1D Conc	20	22.	11/15/06
Nov. 2006	604	01092	Zinc, Total (Zn)	1D Qty	3.99	4.0655	11/20/06
January 2007	002	00400	pH	1D Conc	6.0	5.7	1/31/07
February 2007	002	00400	pH	1D Conc	6.0	4.8	2/7/07
February 2007	002	00400	pH	1D Conc	9	10.	2/28/07
March 2007	002	00400	pH	1D Conc	9	10.	3/7/07

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	002	00400	pH	1D Conc	6.0	3.	3/21/07
April 2007	002	00400	pH	1D Conc	6.0	1.3	4/4/07
April 2007	002	00400	pH	1D Conc	9	11.	4/25/07
June 2007	002	00400	pH	1D Conc	6.0	1.	6/20/07
July 2007	002	00400	pH	1D Conc	6.0	3.3	7/3/07
Sept. 2007	003	00550	Oil and Grease, Total	30D Conc	15	35.4166	9/1/07
Sept. 2007	003	00550	Oil and Grease, Total	1D Conc	20	400.	9/6/07
Sept. 2007	003	00550	Oil and Grease, Total	1D Conc	20	25.	9/7/07
January 2008	002	00400	pH	1D Conc	6.0	5.9	1/30/08

A copy of our inspection report is enclosed. The sampling data also includes a sampling event from March 5 and 6, 2007. For both sampling events, the mixing zones were acutely toxic for *Ceriodaphnia dubia*. Heavy foam was noted at 003 within the boomed area on 9/10/07 and an oily sheen inside the boom on 9/11/07. Both incidents are in violation of Part III, 2.b of the permit.



Above is the boomed area at 003.



Above is upstream 003 monitoring point.

This facility continuously appears to have difficulty in maintaining compliance in accordance with its NPDES permit. The permittee is required to maintain and improve its treatment facilities as needed in order to be in compliance with the Facility's NPDES Permit.

Please find attached a CD containing pictures taken on various dates at the Yorkville, North and Martins Ferry plants.

The assistance 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

Enclosures

- c: Thomas Waligura, Wheeling Pittsburgh Steel
- c: Jim Lewis, Wheeling Pittsburgh Steel

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01D00035*ED	OH0011371	September 19, 2007	S	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Wheeling Pittsburgh Steel Corporation – Yorkville Plant 219 Public Road Yorkville, OH 43971	~10:00A.M.	08/01/04
	Exit Time	Permit Expiration Date
	~12:00P.M.	1/31/09

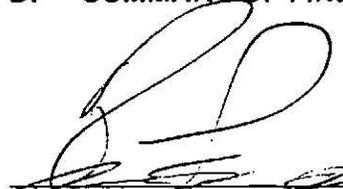
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jim Lewis, Wheeling Pittsburgh Steel, Manager Environmental Control	Cell 740-278-2184
Tom Waligura, Wheeling Pittsburgh Steel, Manager Environmental Control	304-234-2682
Name, Address and Title of Responsible Official	Phone Number
Bud E. Smith, Director of Environmental Control Wheeling Pittsburgh Steel 1134 Market Street Wheeling, WV 26003	740-859-6766 304-234-2662

C. AREAS EVALUATED DURING INSPECTION

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

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

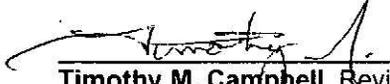
D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

2-13-08

Date



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

2/14/08

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 ¹			
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			

¹There have been some pH excursions at 002 and Oil and Grease violations at 003.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X ¹			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule	X			
d. Compliance schedule contained in: Part I, C. of permit	X			
e. Permittee is meeting compliance schedule	X			

¹There have been pH excursions, Oil and Grease, and Zinc violations.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator 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 7 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 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

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
 _____ X N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current				X
c. Sludge adequately disposed (Method: Landfill)				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
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			

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 _____ Other <u> X </u> ultrasonic & weir _____ Specify:				
b.	Calibration frequency adequate (annual)	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				

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	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: All except pH, flow, and rainfall 2. Lab name: Pace Analytical	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: _____ Satisfactory					
_____ Marginal					
_____ Unsatisfactory					

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
003	Slight inside boom on 9/11/2007	none	none	Foam inside boom on 9/10/07	none	clear	

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 dust clouds 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		

L. SAMPLING PROCEDURES

- Grab samples obtained
- Composite obtained
- Compositing frequency: _____ Preservation: _____
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device
- Sample refrigerated during compositing: Yes No
- Sample representative of volume and nature of discharge: Yes

Ohio Environmental Protection Agency
Division of Surface Water
Southeast District Office
Compliance Field Data Table 1a

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: OIC00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: OIC00020*DD. Effluent sampled on 3-5-2007 to 3-6-2007.

Station	Date	Time	Parameter	Units	OEPA Value	Permit Limits
003	3-5-2007	10:55	pH	S.U.	7.77	6.0 – 9.0
			Temp.	^o C	18.59	----
			Dissolved O ₂	mg / l	7.34	----
			Conductivity	mhos/cm ³	1047	----
003	3-6-2007	10:45	pH	S.U.	8.98	6.0 – 9.0
			Temp.	^o C	12.68	----
			Dissolved O ₂	mg / l	6.36	----
			Conductivity	mhos/cm ³	1032	----
			Flow	mg/d	2.4	----
003 Composite	3-5/6-2007	11:00	pH	S.U.	8.73	----
			Temp.	^o C	3.41	----
			Dissolved O ₂	mg / l	11.0	----
			Conductivity	mhos/cm ³	1112	----
002	3-6-2007	12:55	pH	S.U.	8.66	6.0 – 9.0
			Temp.	^o C	7.41	----
			Dissolved O ₂	mg / l	11.83	----
			Conductivity	mhos/cm ³	254	----

Ohio Environmental Protection Agency

Division of Surface Water

Southeast District Office

Compliance Laboratory Data Table 2a

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: 01C00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: 01C00020*DD. Effluent sampled on 3-5-2007 to 3-6-2007.

Station	T ¹	Parameter	Units	Ohio EPA		Permit Limits	
				Conc.	Loading (kg / day)	Conc.	Loading (kg / day)
003	C	CBOD ₅	mg/l	6.4			
	C	BOD ₅	mg/l	8.6			
	C	TSS	mg/l	13			
	C	TDS	mg/l	630			
	C	As	ug/l	<2.0			
	C	Cd	ug/l	<0.20			
	C	Pb	ug/l	<2.0			
	C	Se	ug/l	<2.0			
	C	Al	ug/l	<200			
	C	Ba	ug/l	46			
	C	Ca	mg/l	146			
	C	Cr	ug/l	<30			
	C	Cu	ug/l	<10			
	C	Hardness	mg/l	410			
	C	Fe	ug/l	4040			
	C	Mg	mg/l	11			
	C	Mn	ug/l	258			
	C	Ni	ug/l	<40			
	C	K	mg/l	13			
	C	Na	mg/l	44			
	C	Sr	ug/l	304			
	C	Zn	ug/l	<10			
	C	Hg	ug/l	<0.20			
	C	NH ₃	mg/l	0.074			
	C	COD	mg/l	11			
	C	Chloride	mg/l	266			
	C	Nitrate-Nitrite	mg/l	0.41			
	C	TKN	mg/l	0.98			
	C	Phosphorus	mg/l	0.047			
	G	Oil & Grease	mg/l	<2.0			20
	G	CN ⁻	ug/l	<10			
	G	Phenolics	mg/l	17.9			
	G	Fecal coliform	cfu	20			
	G	<i>E. coli</i>	cfu	10			

1 Sample type C = Composite G = Grab < less than detection limit. ---- no value.

Ohio Environmental Protection Agency
Division of Surface Water
Southeast District Office

Compliance Laboratory Data Table 3a

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: 0IC00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: 0IC00020*DD. Effluent sampled on 3-6-2007.

Station	T ¹	Parameter	Units	Ohio EPA		Permit Limits	
				Conc.	Loading (kg / day)	Conc.	Loading (kg / day)
002	G	Al	ug/l	<200			
	G	Ba	ug/l	<15			
	G	Ca	mg/l	5			
	G	Cr	ug/l	<30			
	G	Cu	ug/l	<10			
	G	Hardness	mg/l	13			
	G	Fe	ug/l	396			
	G	Mg	mg/l	<1			
	G	Mn	ug/l	28			
	G	Ni	ug/l	<40			
	G	K	mg/l	<2			
	G	Na	mg/l	46			
	G	Sr	ug/l	<30			
	G	Zn	ug/l	67			
	G	Oil & Grease	mg/l	2.0		20	46

¹ Sample type C = Composite G = Grab < less than detection limit. ----- no value.

Ohio Environmental Protection Agency
Division of Surface Water
Southeast District Office
Compliance Field Data Table 1b

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: OIC00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: OIC00020*DD. Effluent sampled on 9-10-2007 to 9-11-2007.

Station	Date	Time	Parameter	Units	OEPA Value	Permit Limits
003	9-10-2007	10:30	pH	S.U.	7.77	6.0 – 9.0
			Temp.	°C	29.96	----
			Dissolved O ₂	mg / l	6.39	----
			Conductivity	mhos/cm ³	1319	----
			Chlorine	mg/l	0.09	----
003	9-11-2007	10:10	pH	S.U.	6.29	6.0 – 9.0
			Temp.	°C	32.55	----
			Dissolved O ₂	mg / l	5.93	----
			Conductivity	mhos/cm ³	2508	----
			Chlorine	mg/l	0.03	----
003 Composite	9-11-2007	11:30	pH	S.U.	6.87	----
			Temp.	°C	12.91	----
			Dissolved O ₂	mg / l	12.3	----
			Conductivity	mhos/cm ³	1608	----

**Division of Surface Water
Southeast District Office**

Compliance Laboratory Data Table 2b

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: OIC00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: OIC00020*DD. Effluent sampled on 9-10-2007 to 9-11-2007.

Station	T ¹	Parameter	Units	Ohio EPA		Permit Limits	
				Conc.	Loading (kg / day)	Conc.	Loading (kg / day)
003	C	CBOD ₅	mg/l	16			
	C	TSS	mg/l	<5			
	C	TDS	mg/l	1000			
	C	As	ug/l	<2.0			
	C	Cd	ug/l	<0.20			
	C	Pb	ug/l	<2.0			
	C	Se	ug/l	<2.0			
	C	Al	ug/l	<200			
	C	Ba	ug/l	45			
	C	Ca	mg/l	224			
	C	Cr	ug/l	<30			
	C	Cu	ug/l	<10			
	C	Hardness	mg/l	609			
	C	Fe	ug/l	1730			
	C	Mg	mg/l	12			
	C	Mn	ug/l	407			
	C	Ni	ug/l	<40			
	C	K	mg/l	19			
	C	Na	mg/l	56			
	C	Sr	ug/l	308			
	C	Zn	ug/l	16			
	C	Hg	ug/l	<0.20			
	C	NH ₃	mg/l	0.278			
	C	COD	mg/l	35			
	C	Chloride	mg/l	413			
	C	Nitrate-Nitrite	mg/l	0.16			
	C	TKN	mg/l	0.90			
	C	Phosphorus	mg/l	0.037			
	G	Oil & Grease	mg/l	5.1/2.2*		20	
	G	TSS	mg/l	<5.0			
	G	Phenolics	mg/l	<10.0			
	G	Fecal coliform	cfu	3000			
	G	<i>E. coli</i>	cfu	1900			

¹ Sample type C = Composite G = Grab < less than detection limit. ----- no value.
 * Sample results for 9-10-2007 and 9-11-2007

Ohio Environmental Protection Agency
Division of Surface Water
Southeast District Office

Compliance Laboratory Data Table 3b

Entity: Wheeling Pittsburgh Steel Corporation – Yorkville Plant
 Plant: Yorkville, Belmont Co.
 Permit: OIC00020*DD
 Date: 1-22-2008

Field Parameters for WPS – Yorkville Plant, in Jefferson County,
 Ohio Permit: OIC00020*DD. Effluent sampled on 3-6-2007.

Station	T ¹	Parameter	Units	Ohio EPA		Permit Limits	
				Conc.	Loading (kg / day)	Conc.	Loading (kg / day)
002	G	Al	ug/l	1980			
	G	Ba	ug/l	89			
	G	Ca	mg/l	15			
	G	Cr	ug/l	136			
	G	Cu	ug/l	155			
	G	Hardness	mg/l	46			
	G	Fe	ug/l	176,000			
	G	Mg	mg/l	2			
	G	Mn	ug/l	1080			
	G	Ni	ug/l	82			
	G	K	mg/l	<2			
	G	Na	mg/l	<5			
	G	Sr	ug/l	50			
	G	Zn	ug/l	7310			
	G	Hg	ug/l	0.21			
	G	Oil & Grease	mg/l	2.0		20	46
	G	pH	S.U.	2.40*			

¹ Sample type C = Composite G = Grab < less than detection limit. --- no value.
 * Field chemistry result