



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

November 26, 2008

**Re: Jefferson County  
Severstal Wheeling, Inc. Yorkville Plant  
Notice of Violation  
Correspondence (IWW)**

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

Dear Mr. Smith:

Based on review of records since February 1, 2008, Severstal Wheeling, Inc. Yorkville Plant was found to have reported the following limit violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2008	604	Fecal Coliform	1D Conc	2000	22000.	2/27/2008
June 2008	604	Fecal Coliform	30D Conc	200	294.165	6/1/2008
June 2008	604	Fecal Coliform	1D Conc	400	2000.	6/4/2008
June 2008	604	Fecal Coliform	1D Conc	400	2600.	6/11/2008
July 2008	604	Fecal Coliform	1D Conc	400	840.	7/9/2008
July 2008	003	Chlorine, Total Residual	1D Conc	0.038	.07	7/16/2008
July 2008	604	Fecal Coliform	1D Conc	400	1900.	7/16/2008
November 2008	604	Fecal Coliform	1D Conc	400	18000.	11/5/2008

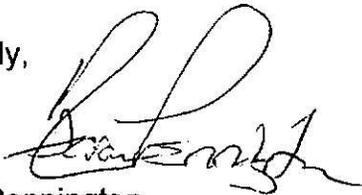
Mark Vignovic notified me by e-mail that the incident on 11/5/2008 was related to running out of on-site sodium hypochlorite. The proposed changes in operations were to reorder at 1,000 gallons remaining vs. 500 gallons. Additionally he suggested that an emergency tote was going to be kept on hand. I would like to mention that operators should be aware that sodium hypochlorite loses its concentration over time going from the 12-15% range down to the single digit percents within months. Adjustments to the dosing system will most likely need to occur in the event the emergency tote was to be used.

In review of the above violations, we see reoccurring difficulties in maintaining compliance with the outfall 604 fecal coliform limits. Also, a residual chlorine limit violation occurred. The believed source of the bacteria is the API separators. I am of the understanding that the Yorkville facility currently feeds chlorine post the filters after the DAF system and then dechlorinates prior to blending with the effluent from the phase II system. We commonly review plans and require 15 minute contact times with

facilities designed for disinfection prior to receiving dechlorination. This requirement is put in place to ensure satisfactory disinfection. Please review your ability to satisfy a 15 minute chlorine contact time prior to dechlorination. Additionally, has there been any consideration or use of an oxidizer in the API separators - perhaps a peroxide or permanganate? An approach of periodic shocking of the separators to kill off bacteria maybe worth looking into. Severstal Wheeling may also want to consider periodically feeding chlorine prior to the filters.

Please provide comments on the above underlined items within 14 calendar days from receipt of this letter. If you have any questions or need additional time, please contact me at (740) 380-5272.

Sincerely,



Aaron Pennington  
District Representative  
Division of Surface Water

AMP/dh

Enclosure

c: Tom Waligura, Severstal Wheeling, Inc., South