State of Ohio Environmental Protection Agency

Southeast District Office

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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

June 15, 2010

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 from December 1, 2009 through April 30, 2010, Severstal Wheeling, Inc. Yorkville Plant reported the following limit violations with respect to National Pollutant Discharge Elimination System (NPDES) Permit number 0ID00035*ED:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2010	002	Chlorine, Total Residual	1D Conc	0.038	.26	4/28/2010

We received an e-mail on May 20, 2010 that included a response:

> "....During our investigations of the acid release we informed you about in May, we discovered via camera videos taken from within the main 002 sewer there are two sources of what appear to be non-stormwater discharges from side laterals into the main 002 sewer. We believe these to be a result of city water leaks. We have since conducted investigations to identify these sources while dealing with the acid release, but we have not yet found the sources. During this time we have been intercepting the water from these sources and preventing any discharge to the river. We will continue this practice until such time we stop the sources and will keep you informed of our progress."

On May 13, 2010, we were contacted by both Severstal Wheeling personnel and Yorkville Sanitary Treatment Plant Personnel about a spent pickle liquor release. Severstal reported that flow originating from the pickle baths had reached outfall 002. A strainer on the piping system had reportedly clogged in the bath which caused an elevated liquid level extending into the fume hoods. The flow exited the baths through the fume hood to an underground ductway. In this underground ductway, it was theorized that the liquid flow found a nexus to both the 002 outfall sewer and the sanitary sewer.

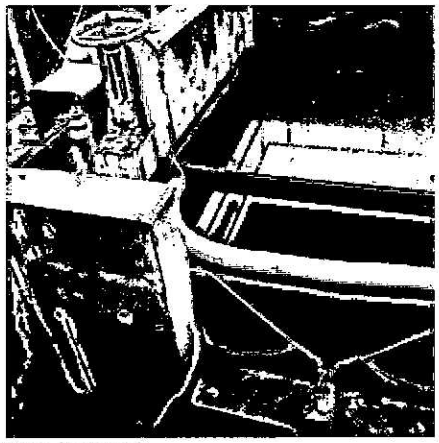
Ductwork to Underground Ductway

Underground Ductway path

002 flow was reported with low pH, discoloration, and a sheen which are all in violation of the NPDES permit. Flow reportedly continues in the sewers associated with 002 since the bath level has been corrected. The flow is described as possibly water supply leaks and a Fume Hood Condensate. The Fume Hood Condensate needs addressed. This condensate is not permitted for discharge. **Respond in writing with a plan to manage and treat the condensate.**

The Yorkville Sanitary Treatment Plant (STP) reported an effluent pH of 3.8 the morning of May 13, 2010 which is out of compliance with its NPDES limits and considerably "adverse" to normal operating condition. The acidic wastewater present in the WWTP influent throughout the night preceding May 13th had apparently upset the STP. Effluent conditions included sheen, foaming, and discoloration. The spent pickle liquor that affected the plant has accumulated in the sludge in the aerobic digester and one of the two oxidation ditches. The discharge to the Yorkville STP was in violation of OAC 3745-3-04.

Severstal Wheeling is reportedly assisting Yorkville in securing a portable press to remove the solids from the aerobic digester for lime stabilization and disposal at a landfill. Separated liquids from the oxidation ditch are planned to be routed to the STP chlorine contact tank for disinfection. The washwater from the portable press was planned to be accumulated in a portable frac tank and tested before concluding whether to reintroduce it to the STP. Please keep Ohio EPA informed on your actions to assist Yorkville in restoring the STP. Please also describe how the pickle liquor was able to enter the sanitary sewer and what measures have been taken to prevent a recurrence of the discharge to the Yorkville sewer.



Yorkville STP Chlorine contact/flow monitoring structure (2 train)

Please provide comments on the above 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

AP/dh

Enclosure

c: Fred Snell, Ohio EPA, DSW, SEDO
c: John Rochotte, Ohio EPA, DHWM, SEDO
c: Yorkville STP operator
c: Brian Ball, AAG/EES