

WPS
0641090010
Correspondence



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

December 31, 2007

Re: Jefferson County
Wheeling-Pittsburgh Steel
Corporation - Steubenville
Facility ID # 0641090010
Warning Letter

Certified: 70063450000190561874

Harold Strohmeyer
Wheeling-Pittsburgh Steel Corporation - Steubenville
South Third Street Extension
Mail Drop SS12
Steubenville, OH 43952

Dear Mr. Strohmeyer:

On November 15, 2007, Sarah Harter and I performed an inspection of the Wheeling-Pittsburgh Steel Corporation - Steubenville facility in Steubenville, Ohio, and I completed the inspection on December 11 & 12, 2007. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations. I have enclosed a copy of the completed inspection forms for your reference. Your cooperation and assistance were greatly appreciated during the visits.

Wheeling-Pittsburgh Steel was issued a Title V permit on January 22, 2004. This permit will expire on February 12, 2009. During the inspections, I reviewed records required by permits to install and the Title V permit and performed a visual inspection of the facility. Based on this review, the following violations were noted:

1. **F005, BOF Material Handling:** During the facility tour on 12/11/07, we found that the B baghouse for F005 had a pressure drop outside the permitted range. It was discovered that the rotary valve was plugged. You implemented corrective action which brought the pressure drop within the permitted range. Please provide us with documentation of the completed corrective action.
2. **F010, Slab Caster:** While preparing for the inspection, it was found that the first semiannual report for 2007 was not submitted. Term A.IV.1 of the Title V permit requires semiannual reports of observed visible emissions from the building and the corrective actions taken. Please submit this report as soon as possible.
3. **F014, Primary Pellet Unloading:** After reviewing the facility records for F014, it was noted that duplicate copies of the record keeping data sheets required for Term A.III.2 of the Title V permit showed conflicting information. Please make sure that the data sheets are being filled out consistently.

4. **F022, EAF Material Handling Operations:** A review of the facility records for F022 showed that no monitoring or record keeping are being done for several material handling operations required by Term A.III.1 in PTI #06-07507. The permit requires all of the material handling operations to be inspected. If the permit is incorrect, it will need revised. Until that time, you are required to follow the permit, even though several of the material handling operations are a duplication of the BOF (F005) material handling operations. Please submit a revised record keeping data sheet.
5. **P111, #3 Pickler:** On the tour of the facility on 12/12/07, it was found that the gauge that recorded pressure drop and water flow rate for the scrubber was not operating correctly as required by Term A III.1 in the Title V permit. 40 CFR Part 63.1160(b)(2) contains requirements for corrective action. Please describe the corrective action that will be implemented and provide us with documentation.
6. **P904, BOF:** A review of the facility records show that the water flow rate for the venturi scrubber is below the minimum of 1,958 gallons/minute as required by Term A.II.7 in PTI #06-07507. Please provide an explanation for the consistently low water flow rate.
7. **P913, EAF:** While on the facility tour on 12/11/07, red fumes were being emitted by the EAF. It was explained that this was due to a delta change. Please provide us with more information on the cause of the fumes.

Ongoing Performance Test Issues:

P913, EAF: The results of the most recent performance test on 5/23/06 showed the source to be out of compliance with the opacity limit. The compliance plan dated 8/18/06 stated that an auxiliary canopy sheeting and enclosure to capture tapping emissions were being added. The addition of two modules at the EAF and a separate baghouse for the LMF would also be added. You stated that the new baghouse for the LMF would be operational in the spring of 2008.

P903, BF #5: We are reviewing the stack testing history for P903. Based on our records, a test was done on the blast furnace baghouse on 11/14/04 that failed for SO₂, VOC, and Pb. The BF #5 baghouse was retested on 4/19/07 and came back into compliance for VOC and Pb. However, SO₂ failed again, and additionally, the 4/19/07 test on the stove stack failed for VOC.

We are currently evaluating the SO₂ compliance report you submitted on 8/30/07 that requests revisions to the permits. We have additional questions about the impact that increasing the allowable SO₂ rate in PTI #06-06952 (issued on 1/29/04) would have on the synthetic minor status to avoid PSD and netting. Please provide an evaluation of how the change in emissions affects the original PSD analysis.

Harold Strohmeier
Wheeling-Pittsburgh Steel Corporation - Steubenville
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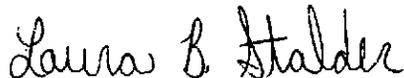
The request for changes to the VOC limit is also being evaluated. It appears that the annual VOC was calculated based on the potential to emit of the unit based on the short term limit of 1.83 lb/hr. In addition to increasing the short term limit, we would need to increase the ton per year unless WPSC requests a restriction to stay at 8.0 tons per year. Please clarify if it is WPSC's intention to request a voluntary restriction. If WPSC would prefer to increase the annual allowable to a higher number, WPSC needs to revise the PSD analysis to ensure that the PSD significance level is not exceeded.

Please submit to this office, **within 30 days of receipt of this letter**, the above requested information and a compliance plan and schedule that addresses how Wheeling Pittsburgh Steel will achieve compliance with the above violations.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5253 or email laura.stalder@epa.state.oh.us.

Sincerely,



Laura Stalder
Environmental Specialist 2
Division of Air Pollution Control
Southeast District Office

LS/mlm

Enclosure