



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Worthington Steel Company
Fulton County
NPDES Permit

January 26, 2012

Ms. Elaine Veth, Environmental Specialist
Worthington Steel Company
6303 County Road 10
Delta, Ohio 43515

Dear Ms. Veth:

This letter is in regard to our January 18, 2012, inspection. You were present and provided operation and maintenance information on the treatment plant. At the time of the inspection, all major treatment processes were in working order.

Wastewater from the scrubber, pickling rinse, Berg Unit cooling tower blow down quench tank blow down, and filter backwashes goes to the wastewater treatment plant (WWTP). Wastewater enters the WWTP through a collection pit. The wastewater is pumped to equalization tanks and is then sent to a neutralization tank where caustic is added. The wastewater then goes to a clarifier with two mixers. Polymer is added in the clarifier to aid in settling. From the clarifier, the treated water goes to two 601 holding tanks (sample point) and then to the final outfall 001. The holding tanks are discharged in a batch operation provided pH and conductivity sampling results meet acceptable limits prior to discharging. The effluent discharging from the clarifier appeared clear with some suspended solids.

The sludge from the clarifier is sent to a filter press. The filter cake falls into a roll-off container and is shipped to Williams County Landfill. About 12 tons per month are shipped out. The sludge is considered non-hazardous. The installation of a new clarifier was discussed during the inspection. The proposed clarifier is to be roughly the same dimension as the existing clarifier but the design and set up of the plate filters inside the clarifier will allow for a greater flow capacity. It was discussed that a permit to install (PTI) will be needed for this system.

A review of the discharge monitoring reports (DMRs) for permit 2ID00014 from March 2011 to January 2012 shows that there was one NPDES permit effluent limit loading violation. The specific instance of non-compliance is enclosed on a separate sheet.

The general permit 2GN00005*DG for the non-contact cooling water discharge was also reviewed during the inspection. It was noted that the blow down from the cooling towers is discharged to the treatment system and the facility has not directly discharged from the cooling towers. The permit is maintained in case there is a need to directly discharge from the cooling towers.

If you have any questions or comments, please contact me at (419) 373-3053

Sincerely, -

Ryan Gierhart
Division of Surface Water

/jlm
Enclosure
ec: Inspection Tracking

Get New Data								
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
21D00014*DD	December 2011	001	50092	Mercury, Total (Low Le	30D Qty	0.00000063	0.00000093	12/1/2011



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2ID00014	OH0122271	01/18/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Worthington Steel Company 6303 C.R. 10 Delta, OH 43515	9:00 a.m.	January 1, 2012
	Exit Time	Permit Expiration Date
	11:30 p.m.	July 31, 2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ms. Elaine Veth – EHS Manager	419-822-2571	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Jeffery Leeper – Operations Manager	(419)822-2523	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
S	Operations & Maintenance	N	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
Final effluent at sampling building appeared clear with no noticeable odor.	
Inspector	Reviewer
 Ryan Gierhart Division of Surface Water Northwest District Office Date: 1-23-2012	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office Date: 1/23/12

Sections E thru K: Complete on all inspections as appropriate

Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... N/A
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Operator holds unexpired license of class required by permit..... N/A
Class:
- (f) Routine and preventative maintenance schedule/performed on time..... Y
- (g) Any major equipment breakdown since last inspection..... N
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... N
- (j) Regulatory agency notified of bypasses..... N/A
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... N

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

No process water will be generated if the power is off.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
(c) Sludge adequately disposed..... Y
(Method:Landfilled)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name:Allied Waste)
(f) Has amount of sludge generated changed significantly since
last inspection..... N
(g) Adequate sludge storage provided at plant.....Y
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... N/A
(j) Any complaints received in last year regarding sludge..... N/A
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

Container of sludge is hauled out every 4-6 weeks.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate Y
(Date of last calibration: Every 6 months)
(c) Secondary instruments operated and maintained..... N/A
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Have a paddle wheel flow meter on the 601 discharge to compare flows.

Final flow meter is an Isco Flow meter calibrated by maintenance every 6 months.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All effluent parameters

Lab name: Jones & Henry
Enviroscience is contracted for Toxicity testing.

Quality Control/Quality Assurance (Jones & Henry Lab)

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other

Comments/Status:

Effluent observed in final outfall sampling building appeared clear with no noticeable odor.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status: