



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 1, 2012

RE: TRUMBULL COUNTY
TATA STEEL
NPDES PERMIT NO. OH0011363
OHIO EPA PERMIT NO. 3IC00056
COMPLIANCE EVALUATION INSPECTION

Mr. Mark Grabigel, Environmental Affairs & Utilities Manager
Thomas Steel Strip Corporation
Delaware Avenue, N.W.
Warren, Ohio 44485

Dear Mr. Grabigel:

Ohio EPA performed a compliance evaluation inspection at the above-referenced facility on February 23, 2012. You represented Tata Steel and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the facility's treatment system, and determine the facility's overall compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

Tata Steel operates a metal finishing operation at the referenced site. Production operations at the facility include, among other things, acid pickling, cold rolling mills, temper mills, and electroplating lines. Process wastewaters generated by these operations are subject to Federal Effluent Guideline Limitations contained in 40 Code of Federal Regulations (CFR) 120.102 and 120.103 (Iron and Steel Manufacturing) and 40 CFR 433.13 and 433.14 (Metal Finishing). Treated process flow is monitored at internal monitoring station 601. The combined plant flows, including storm water, are then processed through an oil/water separator prior to discharge to the Mahoning River through Outfall 001 via the Dickey Run storm sewer.

The current NPDES permit, issued with a modification date of September 1, 2009, expires on July 31, 2013. The permit required Tata Steel to submit an engineering evaluation of its existing wastewater treatment system(s) by no later than August 1, 2010. The required report was submitted within the permit schedule.

In the engineering report, Tata Steel was required to identify any necessary upgrades to the treatment works to meet the final effluent limitations contained in the NPDES permit. The engineering report identified the need for additional treatment components to reduce the amount of discharged process wastewater and to improve the quality of the wastewater that is discharged through Outfall 001.

Permit-to-install (PTI) 808005 was issued on August 15, 2011, and authorized Tata Steel to install components for flow equalization, pH adjustment, microfiltration, and activated carbon filtration. Under separate cover, Ohio EPA also authorized the installation of a reverse osmosis (RO) system that would be operated during a pilot study, originally scheduled to occur from

March 1, 2012 - June 30, 2012. The goal of the pilot study is to determine if compliance with the effluent limitations in the NPDES permit can be maintained with the addition of the RO reject water to the wastewater stream that is discharged through Outfall 001. Once the study is complete, and the results have been analyzed and submitted to this office for review, Tata Steel will submit a PTI application to this office for the RO system. Project delays have delayed the start of the pilot study by several weeks.

At the time of the inspection, the following observations and/or deficiencies were noted:

1. The general operation and maintenance of the 601 and 001 treatment systems appeared to be satisfactory. There was no visual evidence of excessive suspended solids or oil and grease being discharged through Outfall 001.
2. Significant progress has been made on the construction of the RO system and on the treatment system components authorized pursuant to PTI 808005. Per discussions with you, some programming and calibration of the system controls remains. Once these issues are addressed, the pilot study will begin. Please keep this office informed as to the progress of the construction, and the start date for the pilot study.
3. Please submit to this office documentation describing when the Outfall 001 flow meter was last calibrated, and its next scheduled calibration date.
4. Please ensure that samples are collected in appropriate containers (i.e. glass or plastic laboratory sample jugs).
5. Leaf litter and other debris were observed in the skim tank. Please ensure that the tank is cleaned.
6. The facility's Storm Water Pollution Prevention Plan was reviewed and determined to be up to date.
7. You indicated that the recent flow going through Outfall 603 has been minimal.
8. During the inspection, portable containers of coagulant were observed outside. Please ensure that these totes are moved under roof.

A review of the facility's electronic discharge monitoring reports (eDMRs) received by Ohio EPA for the period December 2010 – January 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

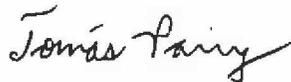
Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2011	601	01074	Nickel, Total Recovera	1D Conc	3880	6141	3/2/2011
March 2011	601	01074	Nickel, Total Recovera	1D Qty	4.76	7.57744	3/2/2011

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Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement action pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please submit to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the above-referenced violations and deficiencies. Your response shall include specific dates for the initiation and completion of this action plan.

Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,



Tomás Parry
Environmental Engineer
Division of Surface Water

TP/cs

Enclosures: Photographs

