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

June 20, 2012

Re: Jefferson County
RG Steel LLC
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Bud E. Smith, Director, Env. Control
RG Steel LLC
1134 Market Street
Wheeling, WV 26003

Dear Mr. Smith:

On May 16, 2012, I conducted compliance evaluation inspections at the RG Steel LLC facilities in Jefferson County. Patrick Smith represented RG Steel LLC during the inspection. We visited the following four facilities:

Yorkville Plant (0ID00035*FD)
Mingo Junction Plant (0ID00034*FD)
Mountain State Carbon, LLC (0ID00010*AD)
Steubenville Plant (0ID00033*GD)

The following are summaries of notes of the various plants:

Yorkville: The Oil Water/Separator (OWS) effluent now reports to the Phase II treatment system. The south clarifier was down during the inspection. A significant amount of sludge had accumulated leading to torque concerns with the sludge rake. Pending landfill approvals reportedly led to a buildup of solids in the clarifiers. Bad sensor/probe is reported for the outfall 601 flow meter. The 601 meter shall be repaired and returned to service immediately. The following is a list of violations reported since June 2011:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Violation Value	Date
604	31616	Fecal Coliform	1D Conc	400	500.	/11/2011
003	50060	Chlorine, Total Residual	1D Conc	0.038	.6	1/26/2012
003	50060	Chlorine, Total Residual	1D Conc	0.038	.05	2/16/2012

Mingo Junction: The continuous cooling tower blowdown from Mingo Junction Energy Center was approximately 45 gpm during the inspection with two boilers. This blowdown is permitted to discharge to outfall 008. The village has combined sewers

Southeast District Office
2195 Front Street
Logan, OH 43138-8637

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and required to optimize performance by identifying clean water connections. **RG Steel should discourage the blowdown (specifically cooling tower) from entering the sanitary sewers.** The following is a list of violations reported since June 2011:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
008	50060	Chlorine, Total Residual	1D Conc	0.038	09	6/22/2010
008	50060	Chlorine, Total Residual	1D Conc	0.038	.05	10/26/2010

Steubenville: Plant not in operation.

Mountain State Carbon, LLC: Renewal permit is being issued draft in May 2012. No observed outfall flows.

Please find the attached compliance inspection reports and reply in writing detailing what alternative measures are being made to relieve the Village of Mingo Junction sanitary sewers from receiving the cooling tower blowdown. A response is requested by July 1, 2012. 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

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0ID00035*FD	OH0011371	May 16, 2012	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
RG Steel LLC, Yorkville Plant 219 Public Road Yorkville, Ohio 43971	10:10 a.m.	April 1, 2012
	Exit Time	**Permit Expiration Date**
	12:20 p.m.	December 31, 2016

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Patrick Smith, Environmental Manager Allen Kahle, Area Maintenance Manager	
Name, Address, & Title of Responsible Official	**Phone Number**
Bud E. Smith, Environmental Control Department RG Steel LLC 1134 Market Street Wheeling, WV 26003	(304) 234-2662

C. AREAS EVALUATED DURING INSPECTION

S	Permit	M	Flow Measurement	N/A	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedules
M	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		Other
S	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

OWS effluent now reports to the Phase II treatment system. The south clarifier was down during the inspection. A significant amount of sludge had accumulated leading to torque concerns with the sludge rake. Pending landfill approvals reportedly led to a buildup of solids in the clarifiers. Bad sensor/probe is reported for the outfall 601 flow meter. See attached cover letter.

Aaron Pennington, Inspector, Ohio EPA, Southeast District Office — Date: 6-19-12

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date: 6/20/12

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable; N/E = Not Evaluated)

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	☒	☐	☐	☐
b. Correct name & location of receiving waters	☒	☐	☐	☐
c. Product(s) & production rates conform with permit application (industries)	☒	☐	☐	☐
d. Flows & loadings conform with NPDES permit	☒	☐	☐	☐
e. Treatment processes are as described in permit application/briefing memo	☒	☐	☐	☐
f. New treatment process(es) added since last inspection	☒	☐	☐	☐
g. Notification given to state of new, different, or increased discharges	☒	☐	☐	☐
h. All discharges are permitted	☒	☐	☐	☐
i. Number & location of discharge points are as described in permit	☒	☐	☐	☐

Comments:
OWS effluent now reports to the Phase II treatment system.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	☒	☐	☐	☐
b. Permittee is taking actions to resolve violations	☒	☐	☐	☐
c. Permittee has compliance schedule	☒	☐	☐	☐
d. Compliance schedule contained in: Part I, C of permit	☒	☐	☐	☐
e. Permittee is meeting compliance schedule	☒	☐	☐	☐

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: ☐ Dual Feed: ☒	☒	☐	☐	☐
b. Adequate alarm system available for power or equipment failures	☒	☐	☐	☐
c. All treatment units in service other than backup units	☒	☐	☐	☐
d. Sufficient operating staff provided: # of shifts: 3 Days/Week: 7	☒	☐	☐	☐
e. Operator holds unexpired license of class required by permit. Class: _____	☐	☐	☒	☐
f. Routine & preventive maintenance schedule/performed on time *	☒	☐	☐	☐
g. Any major equipment breakdown since last inspection	☐	☒	☐	☐
h. Operation & maintenance manual provided & maintained	☒	☐	☐	☐
i. Any plant bypasses since last inspection	☐	☒	☐	☐
j. Regulatory agency notified of bypasses: On MORS: ☐ 800 No.: ☐	☐	☐	☒	☐
k. Any hydraulic and/or organic overloads experienced since last inspection	☐	☒	☐	☐

Comments:
* The south clarifier was down during the inspection. A significant amount of sludge had accumulated leading to torque concerns with the sludge rake. Pending landfill approvals reportedly led to a buildup of solids in the clarifiers.

Collection System	YES	NO	N/A	N/E
a. Percent combined system. Percent: _____	☐	☐	☒	☐
b. Any collection system overflows since last inspection: CSO: ☐ SSO: ☐	☐	☐	☒	☐
c. Regulatory agency notified of overflow (SSOs)	☐	☐	☒	☐
d. CSO O&M plan provided and implemented	☐	☐	☒	☐
e. CSOs monitored and reported in accordance with permit	☐	☐	☒	☐
f. Portable pumps used to relieve system	☐	☐	☒	☐
g. Lift station alarm systems provided and maintained	☐	☐	☒	☐
h. Are lift stations equipped with permanent standby power or equivalent	☐	☐	☒	☐
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	☐	☐	☒	☐
j. Any complaints received since last inspection of basement flooding	☐	☐	☒	☐
k. Are any portions of the sewer system at or near capacity	☐	☐	☒	☐

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: Phase II, Short Creek Landfill	☒	☐	☐	☐
b. If sludge is incinerated, where is ash disposed of? _____	☐	☒	☐	☐
c. Is sludge disposal contracted? Name: Republic	☒	☐	☐	☐
d. Has amount of sludge generated changed significantly since last inspection	☐	☒	☐	☐
e. Adequate sludge storage provided at facility	☐	☒	☐	☐
f. Land application sites monitored and inspected per state rules	☐	☐	☒	☐
g. Records kept in accordance with state rules	☒	☐	☐	☐
h. Any complaints received in last year regarding sludge	☒	☐	☐	☐
i. Is sludge adequately processed (dewatered) in accordance with Ohio EPA rules	☒	☐	☐	☐

Comments:
It appeared that more sludge should be processed to safeguard the sludge rake from failure. The clarifiers had small bubbles (similar to denitrification bubbles) rising to the surface.

I. SELF-MONITORING PROGRAM

Part 1 – Flow Measurement	YES	NO	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: ☒ Ultrasonic & parshall flume ☐ Calculated from influent ☐ Weir ☒ Other ☐ Ultrasonic & weir specify: Visual	☒	☐	☐	☐
b. Calibration frequency adequate. Date of last calibration: every 2 weeks	☒	☐	☐	☐
c. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained	☒	☐	☐	☐
d. Flow measurement equipment adequate to handle expected ranges of flows	☒	☐	☐	☐
e. Actual flow discharged is measured *	☒	☐	☐	☐
f. Flow measuring equipment inspection frequency: ☒ Daily ☐ Monthly ☐ Weekly ☐ Other				

Comments:
* The past month used influent meter because of a bad probe on the 601 meter.

Part 2 - Sampling	YES	NO	N/A	N/E
a. Sampling location(s) are as specified by permit	☒	☐	☐	☐
b. Parameters and sampling frequency agree with permit	☒	☐	☐	☐
c. Permittee uses required sampling method	☒	☐	☐	☐
d. Sample collection procedures are adequate *	☒	☐	☐	☐
i. Samples refrigerated during compositing	☒	☐	☐	☐
ii. Proper preservation techniques used	☒	☐	☐	☐
Conform with 40 CFR 136.3	☒	☐	☐	☐
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, & maintenance records)	☒	☐	☐	☐
f. Adequate records maintained of sampling date, time, exact location, etc.	☒	☐	☐	☐

Comments:
* Oil and Grease Sampling at 601 is to be grab sampled.

Part 3 – Laboratory, General	YES	NO	N/A	N/E
a. Written Standard Operating Procedures (SOPs) for all analysis performed on-site	☒	☐	☐	☐
b. EPA approved analytical testing procedures used (40 CFR 136.3)	☐	☐	☒	☐
c. If alternate analytical procedures are used, proper approval has been obtained	☒	☐	☐	☐
d. Analysis being performed more frequently than required by permit	☒	☐	☐	☐
e. If (c) is yes, are results reported in permittee's self-monitoring report	☒	☐	☐	☐
f. Commercial laboratory used: 1. Parameters analyzed by commercial lab: All except pH, flow & rainfall 2. Lab name: Pace Analytical				

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained	☒	☐	☐	☐
b. Satisfactory calibration and maintenance of instruments and equipment	☒	☐	☐	☐
c. Adequate records maintained	☒	☐	☐	☐
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: DMRQA Study 31 ☒ Satisfactory * ☐ Marginal ☐ Unsatisfactory				

Comments:
* TSS was resubmitted

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	Clear	(1-2 gpm)
002	None	None	None	None	None	Clear	Approx. 0.5 gpm
003	None	None	Same as river	None	None	Same as river	River level impacting outfall
601 (Phase II)	None	None	None	None	None	Clear	

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0ID00034*FD	OH0011355	May 16, 2012	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
RG Steel LLC, Mingo Junction Plant McLister Avenue Mingo Junction, Ohio	1:10 p.m.	November 1, 2006
	Exit Time	**Permit Expiration Date**
	2:20 p.m.	March 31, 2010

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Patrick Smith, Environmental Manager Rick Slater, Plant Manager, Mingo Junction Energy Center	
Name, Address, & Title of Responsible Official	**Phone Number**
Bud E. Smith, Environmental Control Department RG Steel LLC 1134 Market Street Wheeling, WV 26003	(304) 234-2662

C. AREAS EVALUATED DURING INSPECTION

S	Permit *	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedules **
M	Operations & Maintenance ***	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N/A	Sludge Storage/Disposal		Other
N/A	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

* Renewal application received.
** AIM study received along with diffuser PTI for 005. PTI has been issued.
*** Mingo Junction Energy Center is discharging cooling tower and boiler blow down to the Village Sanitary Plant.

Plant is not in production. The continuous cooling tower blowdown from Mingo Junction Energy Center was approximately 45 gpm during the inspection with two boilers. This blowdown is permitted to discharge to outfall 008. The village has combined sewers and required to optimize performance by identifying clean water connections. RG Steel should discourage the blowdown (specifically cooling tower) from entering the sanitary sewers. See attached.

Aaron Pennington — 6-19-12
Aaron Pennington, Inspector, Ohio EPA, Southeast District Office — Date

Jennifer M. Witte — 6/20/12
Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable; N/E = Not Evaluated)

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	☒	☐	☐	☐
b. Correct name & location of receiving waters	☒	☐	☐	☐
c. Product(s) & production rates conform with permit application (industries)	☐	☒	☐	☐
d. Flows & loadings conform with NPDES permit	☐	☒	☐	☐
e. Treatment processes are as described in permit application/briefing memo	☒	☐	☐	☐
f. New treatment process(es) added since last inspection	☐	☒	☐	☐
g. Notification given to state of new, different, or increased discharges	☒	☐	☐	☐
h. All discharges are permitted	☒	☐	☐	☐
i. Number & location of discharge points are as described in permit	☒	☐	☐	☐

Comments:
c. & d. No production is occurring. The facility is being idled.
e. No water treatment is occurring during the idling. The Cogen facility is discharging blowdowns to the Village's sanitary system.
g. The agency was notified about the idling of the plant.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	☐	☒	☐	☐
b. Permittee is taking actions to resolve violations	☒	☐	☐	☐
c. Permittee has compliance schedule	☒	☐	☐	☐
d. Compliance schedule contained in: Permit	☒	☐	☐	☐
e. Permittee is meeting compliance schedule	☒	☐	☐	☐

Comments: a. ~March 2010; See attached cover letter - there were two residual chlorine violations at outfall 008 which is the permitted outfall for the Mingo Junction Energy Center cooling tower blower blowdown.
e. For the compliance schedule associated with 005, a PTI has now been issued. Construction may be pending future operation of the BOF.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: ☐ Dual Feed: ☒	☒	☐	☐	☐
b. Adequate alarm system available for power or equipment failures	☒	☐	☐	☐
c. All treatment units in service other than backup units	☐	☒	☐	☐
d. Sufficient operating staff provided: # of shifts: _____ Days/Week: 7	☐	☐	☒	☐
e. Operator holds unexpired license of class required by permit. Class: _____	☐	☐	☒	☐
f. Routine & preventive maintenance schedule/performed on time *	☐	☐	☐	☒
g. Any major equipment breakdown since last inspection	☐	☒	☐	☐
h. Operation & maintenance manual provided & maintained	☐	☐	☐	☒
i. Any plant bypasses since last inspection	☐	☒	☐	☐
j. Regulatory agency notified of bypasses: On MORS: ☐ 800 No.: ☐	☐	☐	☒	☐
k. Any hydraulic and/or organic overloads experienced since last inspection	☐	☐	☐	☒

Comments: c. No units in service, production has been idled.

Collection System	YES	NO	N/A	N/E
a. Percent combined system. Percent: _____	☐	☐	☒	☐
b. Any collection system overflows since last inspection: CSO: ☐ SSO: ☐	☐	☐	☒	☐
c. Regulatory agency notified of overflow (SSOs)	☐	☐	☒	☐
d. CSO O&M plan provided and implemented	☐	☐	☒	☐
e. CSOs monitored and reported in accordance with permit	☐	☐	☒	☐
f. Portable pumps used to relieve system	☐	☐	☐	☒
g. Lift station alarm systems provided and maintained	☐	☐	☐	☒
h. Are lift stations equipped with permanent standby power or equivalent	☐	☐	☐	☒
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	☐	☐	☐	☒
j. Any complaints received since last inspection of basement flooding	☐	☐	☒	☐
k. Are any portions of the sewer system at or near capacity	☐	☐	☐	☒

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: Landfill and recycle	☒	☐	☐	☐
b. If sludge is incinerated, where is ash disposed of? _____	☐	☒	☐	☐
c. Is sludge disposal contracted? Name: _____	☐	☐	☐	☒
d. Has amount of sludge generated changed significantly since last inspection	☐	☐	☐	☒
e. Adequate sludge storage provided at facility	☒	☐	☐	☐
f. Land application sites monitored and inspected per state rules	☐	☐	☒	☐
g. Records kept in accordance with state rules	☐	☐	☐	☒
h. Any complaints received in last year regarding sludge	☐	☐	☒	☐
i. Is sludge adequately processed (dewatered) in accordance with Ohio EPA rules	☒	☐	☐	☐

Comments:
f. No sludge is being generated during idling.

I. SELF-MONITORING PROGRAM

Part 1 – Flow Measurement	YES	NO	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: ☒ Ultrasonic & parshall flume ☐ Calculated from influent ☐ Weir ☐ Other ☒ Ultrasonic & weir specify: _____	☐	☐	☒	☐
b. Calibration frequency adequate – Plant has been idled for months. Would need calibrated upon plant startup.	☐	☐	☐	☒
c. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained	☐	☐	☐	☒
d. Flow measurement equipment adequate to handle expected ranges of flows	☒	☐	☐	☐
e. Actual flow discharged is measured	☒	☐	☐	☐
f. Flow measuring equipment inspection frequency: ☐ Daily ☐ Monthly ☐ Weekly ☒ Other (being idled)				

Part 2 - Sampling	YES	NO	N/A	N/E
a. Sampling location(s) are as specified by permit	☐	☐	☐	☐
b. Parameters and sampling frequency agree with permit	☒	☐	☐	☐
c. Permittee uses required sampling method	☒	☐	☐	☐
d. Sample collection procedures are adequate	☐	☐	☐	☒
i. Samples refrigerated during compositing	☐	☐	☐	☒
ii. Proper preservation techniques used	☒	☐	☐	☐
Conform with 40 CFR 136.3	☒	☐	☐	☐
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, & maintenance records)	☒	☐	☐	☐
f. Adequate records maintained of sampling date, time, exact location, etc.	☒	☐	☐	☐

Part 3 – Laboratory, General	YES	NO	N/A	N/E
a. Written Standard Operating Procedures (SOPs) for all analysis performed on-site	☒	☐	☐	☐
b. EPA approved analytical testing procedures used (40 CFR 136.3)	☐	☐	☒	☐
c. If alternate analytical procedures are used, proper approval has been obtained	☐	☒	☐	☐
d. Analysis being performed more frequently than required by permit	☐	☐	☒	☐
e. If (c) is yes, are results reported in permittee's self-monitoring report	☒	☐	☐	☐
f. Commercial laboratory used: 1. Parameters analyzed by commercial lab: All except pH, flow & rainfall 2. Lab name: Pace Analytical				

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained	☐	☐	☐	☒
b. Satisfactory calibration and maintenance of instruments and equipment	☐	☐	☐	☒
c. Adequate records maintained	☒	☐	☐	☐
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: Study 31 ☒ Satisfactory * ☐ Marginal ☐ Unsatisfactory				

Comments:
* TSS was resubmitted

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
007	No flow						No observed flow
005	No flow						
003	No flow						Sewer is plugged with stormwater in detention
008	None observed						Submerged

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0ID00033*GD	OH0011347	May 16, 2012	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
RG Steel LLC, Steubenville Plant South Third Street Steubenville, Ohio 43952	~2:40 p.m.	August 1, 2005
	Exit Time	**Permit Expiration Date**
	~2:50 p.m.	July 31, 2009

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Patrick Smith, Environmental Manager	
Name, Address, & Title of Responsible Official	**Phone Number**
Bud E. Smith, Environmental Control Department RG Steel LLC 1134 Market Street Wheeling, WV 26003	(304) 234-2662

C. AREAS EVALUATED DURING INSPECTION

S	Permit *	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	N	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N/A	Sludge Storage/Disposal		Other
N	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

* Permit is expired; renewal application received.

See attached cover letter.

Aaron Pennington, Inspector, Ohio EPA, Southeast District Office — Date: 6-19-12

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date: 6/20/12

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable; N/E = Not Evaluated)

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	☒	☐	☐	☐
b. Correct name & location of receiving waters	☒	☐	☐	☐
c. Product(s) & production rates conform with permit application (industries)	☐	☒	☐	☐
d. Flows & loadings conform with NPDES permit	☐	☒	☐	☐
e. Treatment processes are as described in permit application/briefing memo	☒	☐	☐	☐
f. New treatment process(es) added since last inspection	☐	☒	☐	☐
g. Notification given to state of new, different, or increased discharges	☒	☐	☐	☐
h. All discharges are permitted	☒	☐	☐	☐
i. Number & location of discharge points are as described in permit	☒	☐	☐	☐

Comments:
c. & d. No production is occurring. The facility is being idled/for sale.
e. No water treatment is occurring during the idling.
g. The agency was notified about the idling of the plant.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	☐	☒	☐	☐
b. Permittee is taking actions to resolve violations	☐	☐	☒	☐
c. Permittee has compliance schedule	☐	☒	☐	☐
d. Compliance schedule contained in: _____	☐	☐	☒	☐
e. Permittee is meeting compliance schedule	☐	☐	☒	☐

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: ☐ Dual Feed: ☐	☐	☐	☐	☒
b. Adequate alarm system available for power or equipment failures	☐	☐	☐	☒
c. All treatment units in service other than backup units	☐	☒	☐	☐
d. Sufficient operating staff provided: # of shifts: _____ Days/Week: 7	☐	☐	☒	☐
e. Operator holds unexpired license of class required by permit. Class: _____	☐	☐	☒	☐
f. Routine & preventive maintenance schedule/performed on time *	☐	☐	☐	☒
g. Any major equipment breakdown since last inspection	☐	☐	☐	☒
h. Operation & maintenance manual provided & maintained	☐	☐	☐	☒
i. Any plant bypasses since last inspection	☐	☒	☐	☐
j. Regulatory agency notified of bypasses: On MORS: ☐ 800 No.: ☐	☐	☐	☒	☐
k. Any hydraulic and/or organic overloads experienced since last inspection	☐	☒	☐	☐

Comments:
c. No units in service for production has been idled.

Collection System	YES	NO	N/A	N/E
a. Percent combined system. Percent: _____	☐	☐	☒	☐
b. Any collection system overflows since last inspection: CSO: ☐ SSO: ☐	☐	☐	☒	☐
c. Regulatory agency notified of overflow (SSOs)	☐	☐	☒	☐
d. CSO O&M plan provided and implemented	☐	☐	☒	☐
e. CSOs monitored and reported in accordance with permit	☐	☐	☒	☐
f. Portable pumps used to relieve system	☐	☐	☐	☒
g. Lift station alarm systems provided and maintained	☐	☐	☐	☒
h. Are lift stations equipped with permanent standby power or equivalent	☐	☐	☐	☒
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection	☐	☐	☐	☒
j. Any complaints received since last inspection of basement flooding	☐	☐	☒	☐
k. Are any portions of the sewer system at or near capacity	☐	☐	☐	☒

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: Landfill	☐	☐	☐	☒
b. If sludge is incinerated, where is ash disposed of? _____	☐	☒	☐	☐
c. Is sludge disposal contracted? Name: _____	☒	☐	☐	☐
d. Has amount of sludge generated changed significantly since last inspection	☐	☐	☐	☒
e. Adequate sludge storage provided at facility	☒	☐	☐	☐
f. Land application sites monitored and inspected per state rules	☐	☐	☒	☐
g. Records kept in accordance with state rules	☐	☐	☐	☒
h. Any complaints received in last year regarding sludge	☐	☐	☒	☐
i. Is sludge adequately processed (dewatered) in accordance with Ohio EPA rules	☒	☐	☐	☐

Comments:
e., f., & k. The sludge disposal was contracted during previous operations. But no sludge is being generated during idling.

I. SELF-MONITORING PROGRAM

Part 1 – Flow Measurement	YES	NO	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: ☐ Ultrasonic & parshall flume ☐ Calculated from influent ☐ Weir ☐ Other ☒ Ultrasonic & weir (005) specify: _____	☐	☐	☒	☐
b. Calibration frequency adequate. Date of last calibration: Plant has been idled for months; would need calibrated upon plant startup	☐	☐	☐	☒
c. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained	☐	☐	☐	☒
d. Flow measurement equipment adequate to handle expected ranges of flows	☒	☐	☐	☐
e. Actual flow discharged is measured	☒	☐	☐	☐
f. Flow measuring equipment inspection frequency: ☐ Daily ☐ Monthly ☐ Weekly ☒ Other (being idled)				

Part 2 - Sampling	YES	NO	N/A	N/E
a. Sampling location(s) are as specified by permit	☒	☐	☐	☐
b. Parameters and sampling frequency agree with permit	☒	☐	☐	☐
c. Permittee uses required sampling method	☒	☐	☐	☐
d. Sample collection procedures are adequate	☒	☐	☐	☐
i. Samples refrigerated during compositing	☐	☐	☒	☐
ii. Proper preservation techniques used	☒	☐	☐	☐
Conform with 40 CFR 136.3	☒	☐	☐	☐
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, & maintenance records)	☒	☐	☐	☐
f. Adequate records maintained of sampling date, time, exact location, etc.	☒	☐	☐	☐

Part 3 – Laboratory, General	YES	NO	N/A	N/E
a. Written Standard Operating Procedures (SOPs) for all analysis performed on-site	☐	☐	☐	☐
b. EPA approved analytical testing procedures used (40 CFR 136.3)	☒	☐	☐	☐
c. If alternate analytical procedures are used, proper approval has been obtained	☐	☐	☒	☐
d. Analysis being performed more frequently than required by permit	☐	☒	☐	☐
e. If (c) is yes, are results reported in permittee's self-monitoring report	☐	☐	☒	☐
f. Commercial laboratory used: 1. Parameters analyzed by commercial lab: All except pH, flow & rainfall 2. Lab name: Pace Analytical				

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained	☐	☐	☐	☒
b. Satisfactory calibration and maintenance of instruments and equipment	☐	☐	☐	☒
c. Adequate records maintained	☒	☐	☐	☐
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: Study 31, submitted 8/3/11 ☒ Satisfactory * ☐ Marginal ☐ Unsatisfactory				

Comments:
* TSS was ran a second time

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
005	No flow						

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0ID00010*AD	OH0134988	May 16, 2012	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Mountain State Carbon, LLC, Water Intake Pumphouse South Third Street Steubenville, Ohio (adjacent to RG Steel, Steubenville Plant)	2:30 p.m.	August 1, 2005
	Exit Time	**Permit Expiration Date**
	2:40 p.m.	July 31, 2009

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Patrick Smith, Environmental Manager	
Name, Address, & Title of Responsible Official	**Phone Number**
Bud E. Smith, Director of Environmental Control RG Steel, LLC 1134 Market Street Wheeling, WV 26003	(304) 234-2662

C. AREAS EVALUATED DURING INSPECTION

S	Permit*	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	N/A	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N/A	Sludge Storage/Disposal		Other
N/A	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

* Permit is expired; renewal application received; draft is being issued May 2012.

There was no rain or outfall flow observed during the inspection. The current permit has expired. The agency received a renewal for this permit and is processing with draft issuance in May 2012.

Aaron Pennington, Inspector, Ohio EPA, Southeast District Office — Date: 6-19-12

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date: 6/20/12