



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

November 20, 2012

RE: TRUMBULL COUNTY  
ARCELORMITTAL - WARREN, INC.  
NPDES PERMIT NO. OH0011274  
OHIO EPA PERMIT NO. 3ID00004

Mr. Jeffrey Foster, Operations Mgr.  
ArcelorMittal – Warren, Inc.  
2234 Main Avenue, SW  
Warren, OH 44481

Mr. Foster:

Ohio EPA conducted a compliance evaluation inspection of the above-referenced facility on November 8, 2012. Ms. Marian Gammon and you represented ArcelorMittal - Warren, Inc. and the undersigned represented Ohio EPA. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of its National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following observations and/or deficiencies were noted:

1. Discussions with Ms. Gammon indicated that ArcelorMittal – Warren, Inc. continues to plan for major capital improvements and repairs to be performed at the facility.
2. Visual observations of Outfall 014 and Outfall 015 did not indicate any evidence of excessive floating oil or excessive suspended solids being discharged to the Mahoning River. While a slight sheen was observed at Outfall 015, it seemed to be mostly contained by an existing dam of sticks and other debris. Absorbent booms were installed at Outfall 015 to further help contain the sheen.
3. Ms. Gammon explained that ArcelorMittal – Warren, Inc. is exploring the feasibility of relocating the automatic composite sampler at Outfall 014 from its present location to the discharge side of the containment area. This is being proposed in response to a suggestion made by this office during a past inspection. Please provide a proposed schedule for this change to be made.
4. The facility's Storm Water Pollution Prevention Plan (SWP3) was last revised/updated in January 2009. During the last inspection on September 29, 2011, Ms. Gammon explained that the SWP3 would be updated by the end of 2011. Due to the hiring of several new employees, ArcelorMittal – Warren, Inc. will now update the SWP3 by the end of 2012. Please notify this office when the update has occurred.
5. A review of the monthly storm water inspection reports indicated that a number of storage tanks and their associated containment berms throughout the facility are in need

of repair and/or maintenance. Please ensure that the repair/maintenance work is initiated, and that documentation describing the schedule for completing the work is submitted to this office within 45 days' receipt of this letter.

6. Ms. Gammon explained that ArcelorMittal – Warren, Inc. may be purchasing a portion of the neighboring RG Steel, LLC property in the future, including pumphouse #7. Should the transaction occur, please notify this office so that any necessary NPDES permit modifications can be made.

A review of the electronic Discharge Monitoring Reports received by Ohio EPA for the period September 2011 through October 2012 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3ID00004*GD	January 2012	014	00010	Water Temperature			AD	1/13/2012
3ID00004*GD	January 2012	014	50050	Flow Rate			AD	1/13/2012
3ID00004*GD	January 2012	014	00010	Water Temperature			AD	1/14/2012
3ID00004*GD	January 2012	014	50050	Flow Rate			AD	1/14/2012

In addition to the inspection findings, please ensure that all requirements of the Mercury Variance Language contained in Part II, M of the NPDES permit are being met. Please take note of any required reports and/or other submittals. These must be submitted to Ohio EPA within the prescribed time frames described in the above-referenced section of the NPDES permit.

Please provide to this office, within 14 days' receipt of this letter, written documentation describing the actions that will be taken, or have been taken, to address the above-referenced violations and/or deficiencies. Your response shall include specific dates for the initiation and completion of this action plan. Please be advised that violations of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

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

Respectfully,



Tomás Parry, P.E.  
Environmental Engineer  
Division of Surface Water

TP/cs

cc: Marian Gammon, ArcelorMittal – Warren, Inc.

Attachment: Photos

