



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

Re: Richland County
ArcelorMittal Shelby
NPDES Permit

February 8, 2013

Mr. Dane S. Smith
General Operations Manager
ArcelorMittal Tubular Products Shelby
132 West Main Street
Shelby, Ohio 44875

Dear Mr. Smith:

On January 17, 2013, Walter Ariss, Lynette Hablitzel, Megan Zale, and Jessica Heitman of our office conducted an inspection of the wastewater treatment system and storm water discharges at the ArcelorMittal Tubular Products Shelby plant to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit. Mr. Michael Graham and Mr. David Monnin of your company provided information regarding plant operation and maintenance and provided a tour of the facility.

At the time of the inspection, the process wastewater treatment plant (WWTP) was in operation and producing a clear effluent. The sump pump in the lime slaker building basement was malfunctioning. Several inches of water were present on the floor. Mr. Graham stated this problem would be investigated and corrected. No major compliance concerns regarding process wastewater were noted during the inspection.

The inspection included a detailed review of the facility storm water outfalls and potential storm water pollutant sources. The majority of the outfalls were not discharging. Outfall 020 was discharging a slightly turbid effluent. Mr. Graham indicated this outfall is an underground tile that conveys storm water from offsite ArcelorMittal property. The other outfalls that were discharging were flowing clear.

We reviewed which of the storm water outfalls are believed to be "substantially identical" under the NPDES permit for sampling and monitoring. Following the visual inspection and taking into account the differences in potential pollutant sources between the storm water outfalls, we have determined that several of the outfalls may be considered substantially identical. Outfalls 003 and 006 may be considered substantially identical; sampling should be performed at outfall 003. Outfalls 015, 016, and 018 may be considered substantially identical; sampling should be performed at outfall 018. Outfalls 013 and 014 may be considered substantially identical with sampling performed at either location. Outfalls 002, 004, 017, 021, 022, and 023 are unique compared to any other outfalls and shall each be monitored and sampled individually.

Included in Part IV, Item D on pages 34 and 35 of your current NPDES permit is a description of the required contents of your Storm Water Pollution Prevention Plan (SWP3). One of the required contents is "a site map indicating an outline of the drainage area of each storm water outfall, each existing

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structural control measure to reduce pollutants in storm water runoff, surface water bodies, locations where significant materials are exposed to precipitation...". ArcelorMittal Shelby did not have any such map available at the time of the inspection. The map that was provided was deficient in several areas. This is a violation of the conditions of your current NPDES permit. ArcelorMittal Shelby shall develop and submit a storm water site map that meets the requirements outlined in your NPDES permit to the Northwest District Office within six months of the date of this letter.

Mr. Graham did not appear certain as to the discharge point for several catch basins located throughout the property. He did not believe that testing had been performed to verify discharge points. The permit requires the SWP3 to contain a certification that the discharge has been tested or evaluated for the presence for non-storm water discharges. Please make sure the SWP3 includes a description of the results of any test or evaluation, the evaluation criteria or testing method used, the date of the assessment and the onsite drainage points that were observed.

There was evidence of erosion off the pavement near the boom adjacent to outfall 015. There also appeared to be a gully above the detention pond's influent pipe (upstream from outfall 023). The SWP3 must identify areas that have a high potential for erosion and implement measures to limit it. These areas must be included during routine inspections.

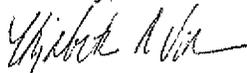
There was a large brown stain on the ground near the refuse dumpster located outside the plant 2 building in the southwest corner near the pickling line entrance. This dumpster is in the drainage area tributary to outfall 023. Please make sure all outside bins and roll-offs containing material are covered and do not leak. When spills occur they must be promptly cleaned up, this may require removing impacted soil.

A review of your discharge monitoring reports for the period of March through December 2012 revealed no limit violations for the parameters contained in your NPDES permit. On September 13, 2012, ArcelorMittal Shelby experienced a discharge from the waste treatment plant settling ponds that consisted of extremely low dissolved oxygen (D.O.) effluent through Outfall 005. The low D.O. levels in the effluent caused a fish kill to occur in Tuby Run. Mr. Graham provided our office a report on the incident and steps taken to mitigate the impacts.

Our office has received your NPDES permit renewal application. The drafting of the permit is almost complete. You will receive a draft copy of the permit before it is issued final. Please review this draft and contact our office with any questions or concerns.

The completed inspection report is enclosed for your review. If you have any questions, please contact Walter Ariss at 419-373-3070.

Yours truly,



Elizabeth A. Wick, P.E.
Environmental Engineer/Section Manager
Division of Surface Water

WA/jlm

Enclosure

pc: Michael Graham, ArcelorMittal Shelby
ec: Tracking



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
OH0008338	2ID00002	1/17/2013	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
ArcelorMittal Tubular Products Shelby 140 West Main St. Shelby, Ohio 44875	10:00 A.M.	7/1/2008
	Exit Time	Permit Expiration Date
	3:30 P.M.	7/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Michael Graham, Manager Chem & Environmental Control	419-342-1373	
Name, Address and Title of Responsible Official	Phone Number	
Dane S. Smith, General Operations Manager	419-342-1242	

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	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	S	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

Summary of Findings area (intentionally blank for this report).

Inspector

Reviewer

Walter Ariss 1/17/13

Thomas Poffenbarger 2/4/13

Walter Ariss
Division of Surface Water
Northwest District Office

Date

Thomas Poffenbarger, P.E.
Water Quality Engineer / Unit Supervisor
Division of Surface Water
Northwest District Office

Date

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:

d) #4 mill no longer operating and has been mothballed
f) nanofiltration trail has been completed. Probably not moving forward with permanent installation.

Section F: Compliance Schedules/Violations

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

Comments/Status:

Had very low D.O. in settling ponds this past summer. Will be working to prevent algae in ponds this coming summer.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... N/A
- (e) Operator of Record holds unexpired license of class required by permit..... N/A
 Class:
- (f) Copy of certificate of Operator of Record displayed on-site..... N
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... N/A
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... N
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... N

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

computer maintenance log, paper log
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... N/A
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... Y
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... N/A

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N
(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
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... Y
- (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:

Treatment Works

- c) Sump pump in lime slaker basement not working. Several inches of water on the floor. Will be repaired.
- h) Repairing fiberglass and metal reactor tanks. \$200,000 project should be complete by end of may 2012.
- g) Although not required by NPDES permit, all treatment plant operators have a license from Ohio EPA. Currently running three shifts at the WTP.

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:Landfill)
- (d) If sludge is incinerated, where is ash disposed of
- (e) Is sludge disposal contracted..... Y
(Name:Rumpke Waste Noble Road Landfill)
- (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..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Sludge is non-hazardous and sent to landfill after going through the plate filter press.

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: magmeters)
- (b) Calibration frequency adequate Y
(Date of last calibration: October or November 2012)
- (c) Secondary instruments operated and maintained..... Y
- (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:

a) 005 has ultrasonic, 601 has a magmeter
b) calibrated 2/year

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/A
 - (c) Analyses being performed more frequently than required by permit. Y
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... N
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: all parameters other than pH, TSS, and O&G
Lab name: Alloway

Quality Control/Quality Assurance

- (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:

c) several parameters are measured as requirements of other environmental permits
d) results typically not reported unless parameters also required by NPDES permit
g) completed in October by Mettler

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
005	none	none	none	none	none	none	none

Comments/Status:

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: