



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

February 14, 2013

RE: TRUMBULL COUNTY
WARREN STEEL HOLDINGS, LLC
NPDES PERMIT NO. OH0011207
OHIO EPA PERMIT NO. 3ID00050
COMPLIANCE EVALUATION INSPECTION

Mark Trapp, Chief Operating Officer
Warren Steel Holdings, LLC
4000 Mahoning Ave., Suite 3660
Warren, OH 44483

Mr. Trapp:

Ohio EPA performed a compliance evaluation inspection of the wastewater treatment works serving the above-referenced facility on February 6, 2013. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

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

1. Production at the facility was halted since December 2012 until now. It was indicated that the facility has since resumed production, and is producing approximately 12 - 15 tons of steel a month.
2. The facility's Stormwater Pollution and Prevention Plan (SWP3) will need to be updated to reflect recent personnel changes.
3. Past stormwater inspection reports as well as any past spill/leak reports were not available for review. These documents must be maintained on file.
4. The required employee stormwater training is not being performed.
5. The overall operation and maintenance of the wastewater treatment systems appeared to be satisfactory. All treatment units appeared to be in operation. An observation of Outfall 005 did not indicate any evidence of floating oil or excessive suspended solids being discharged to the Mahoning River.
6. Please ensure that your wastewater operator is logging in the date, time in/out, a description of work performed, and their initials in the bound and numbered site visit logbook.

A review of the facility's electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period August 2011 – January 2013 indicated violations of the terms and conditions of the NPDES permit. The specific instances of noncompliance include:

Effluent Limit Violations

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3ID00050*JD	August 2011	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	.23135	8/1/2011
3ID00050*JD	August 2011	005	01114	Lead, Total Recoverabl	30D Conc	16.5	22.2	8/1/2011
3ID00050*JD	August 2011	005	01114	Lead, Total Recoverabl	30D Qty	0.04	.09858	8/1/2011
3ID00050*JD	September 2011	005	00550	Oil and Grease, Total	30D Conc	4	8.77	9/1/2011
3ID00050*JD	September 2011	005	00550	Oil and Grease, Total	30D Qty	21.4	30.1505	9/1/2011
3ID00050*JD	October 2011	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	.3781	10/1/2011
3ID00050*JD	October 2011	005	00550	Oil and Grease, Total	30D Conc	4	12.41	10/1/2011
3ID00050*JD	October 2011	005	00550	Oil and Grease, Total	30D Qty	21.4	25.0391	10/1/2011
3ID00050*JD	October 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	147.	10/6/2011
3ID00050*JD	October 2011	005	00550	Oil and Grease, Total	1D Conc	12	16.	10/6/2011
3ID00050*JD	October 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	123.	10/13/2011
3ID00050*JD	October 2011	005	00550	Oil and Grease, Total	1D Conc	12	28.7	10/13/2011
3ID00050*JD	October 2011	005	00550	Oil and Grease, Total	1D Qty	64.1	100.156	10/13/2011
3ID00050*JD	October 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	207.	10/27/2011
3ID00050*JD	October 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	.70507	10/27/2011
3ID00050*JD	November 2011	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	.37875	11/1/2011
3ID00050*JD	November 2011	005	01114	Lead, Total Recoverabl	30D Conc	16.5	45.7333	11/1/2011
3ID00050*JD	November 2011	005	01114	Lead, Total Recoverabl	30D Qty	0.04	.07483	11/1/2011
3ID00050*JD	November 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	405.	11/3/2011
3ID00050*JD	November 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	153.	11/17/2011
3ID00050*JD	November 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	218.	11/24/2011
3ID00050*JD	November 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	.87975	11/24/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	187.	12/1/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	.83208	12/1/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	1.23749	12/1/2011
3ID00050*JD	December 2011	005	01114	Lead, Total Recoverabl	30D Conc	16.5	66.12	12/1/2011
3ID00050*JD	December 2011	005	01114	Lead, Total Recoverabl	30D Qty	0.04	.21339	12/1/2011
3ID00050*JD	December 2011	005	01119	Copper, Total Recovera	1D Qty	0.11	.11347	12/1/2011
3ID00050*JD	December 2011	005	01119	Copper, Total Recovera	30D Qty	0.09	.11347	12/1/2011

3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	337.	12/8/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	1.35208	12/8/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	374.	12/15/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	443.	12/22/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	2.05201	12/22/2011
3ID00050*JD	December 2011	005	01114	Lead, Total Recoverabl	1D Conc	65	83.1	12/22/2011
3ID00050*JD	December 2011	005	01114	Lead, Total Recoverabl	1D Qty	0.34	.38493	12/22/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Conc	90	613.	12/29/2011
3ID00050*JD	December 2011	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	1.95129	12/29/2011
3ID00050*JD	December 2011	005	01114	Lead, Total Recoverabl	1D Conc	65	99.7	12/29/2011
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	2.41514	1/1/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	30D Conc	16.5	77.625	1/1/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	30D Qty	0.04	.39115	1/1/2012
3ID00050*JD	January 2012	005	01119	Copper, Total Recovera	30D Qty	0.09	.19014	1/1/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Conc	90	704.	1/5/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	4.92132	1/5/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	1D Conc	65	104.	1/5/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	1D Qty	0.34	.72701	1/5/2012
3ID00050*JD	January 2012	005	01119	Copper, Total Recovera	1D Qty	0.11	.19014	1/5/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Conc	90	523.	1/13/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	2.35765	1/13/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	1D Conc	65	75.9	1/13/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	1D Qty	0.34	.34215	1/13/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Conc	90	349.	1/19/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	1.45689	1/19/2012
3ID00050*JD	January 2012	005	01114	Lead, Total Recoverabl	1D Conc	65	67.4	1/19/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Conc	90	273.	1/26/2012
3ID00050*JD	January 2012	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	.9247	1/26/2012
3ID00050*JD	February 2012	005	01094	Zinc, Total Recoverabl	30D Qty	0.16	.25904	2/1/2012
3ID00050*JD	February 2012	005	01114	Lead, Total Recoverabl	30D Qty	0.04	.05172	2/1/2012
3ID00050*JD	February 2012	005	01119	Copper, Total Recovera	30D Qty	0.09	.09265	2/1/2012
3ID00050*JD	February 2012	005	01094	Zinc, Total Recoverabl	1D Conc	90	206.	2/2/2012
3ID00050*JD	February 2012	005	01094	Zinc, Total Recoverabl	1D Qty	0.48	.76653	2/2/2012
3ID00050*JD	October 2012	005	00550	Oil and Grease, Total	30D Conc	4	6.63	10/1/2012

3ID00050*JD	October 2012	601	31616	Fecal Coliform	30D Conc	1000	1643.16	10/1/2012
3ID00050*JD	October 2012	601	31616	Fecal Coliform	1D Conc	2000	9000.	10/11/2012
3ID00050*JD	November 2012	005	00550	Oil and Grease, Total	30D Conc	4	5.97	11/1/2012
3ID00050*JD	November 2012	005	00550	Oil and Grease, Total	30D Qty	21.4	25.8051	11/1/2012
3ID00050*JD	December 2012	005	00550	Oil and Grease, Total	30D Conc	4	4.685	12/1/2012

Reporting Code Violations

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3ID00050*JD	January 2013	601	31616	Fecal Coliform			AK	1/10/2013

The eDMR review indicated that Warren Steel Holdings, LLC is in **significant noncompliance** with the terms and conditions of the NPDES permit due to the excessive and recurrent Oil and Grease limit violations. This office understands that Warren Steel Holdings, LLC is in the process of evaluating the treatment works to determine the cause of the Oil and Grease violations. Please keep this office up to date on the status of this investigation.

Please note that persistent NPDES permit violations may require this office to initiate enforcement action against Warren Steel Holdings, LLC to address the matter. Such actions can result in fines of up to \$10,000 per day of violation. Additionally, present or past instances of noncompliance can continue as subjects of pending or future enforcement actions.

Please inform this office in writing, within 14 days' receipt of this correspondence, as to the actions that have been taken, or proposed, to address all of the items referenced in this letter. 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, P.E.
 Environmental Engineer
 Division of Surface Water

TP/cs