



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

Re: **Notice of Violation**  
Worthington Steel Company  
Fulton County  
NPDES Permit

March 6, 2013

Ms. Elaine Veth  
Environmental Specialist  
Worthington Steel Company  
6303 County Road 10  
Delta, Ohio 43515

Dear Ms. Veth:

This letter is in regard to our February 21, 2013, inspection. You were present and provided operation and maintenance information on the treatment plant. At the time of the inspection, all major treatment processes were in working order.

Wastewater from the scrubber, pickling rinse, Berg Unit cooling tower blow down quench tank blow down, and filter backwashes goes to the wastewater treatment plant (WWTP). Wastewater enters the WWTP through a collection pit. The wastewater is pumped to equalization tanks and is then sent to a neutralization tank where caustic is added. The wastewater then goes to a flocculating mix system where Polymer is added. Then the wastewater enters a three cell plate clarifier. From the clarifier, the treated water goes to two 601 holding tanks (sample point) and then to the final outfall 001. The holding tanks are discharged in a batch operation provided pH and conductivity sampling results meet acceptable limits prior to discharging. The effluent discharging from the clarifier appeared clear with some suspended solids.

The sludge from the clarifier is sent to a filter press. The filter cake falls into a roll-off container and is shipped to Williams County Landfill. About 12 tons per month are shipped out. The sludge is considered non-hazardous.

The new plate clarifier was installed in July 2012. Along with the new clarifier, a flocculation system was added. The flocculation system was not included in the plans for the clarifier's approved Permit to Install (PTI). **An as-built PTI application with the appropriate forms and \$200 application fee will need to be submitted including the detail plans for the flocculation system.**

Ms. Elaine Veth  
March 6, 2013  
Page Two

A review of the discharge monitoring reports (DMRs) from March 2012 to February 2013 shows that there have been several National Pollutant Discharge Elimination System (NPDES) permit effluent limit violations. The specific instances of non-compliance are enclosed on a separate sheet. We noted that the chlorine violation resulted from the de-chlorination chemical pump losing its prime.

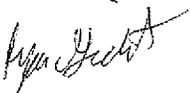
It was also noted during the inspection that the flow meter data that was reported in eDMR was not accurate for the month of December. You believed that the meter was reading high and was recalibrated. The high flow readings resulted in loading limit violations. We recommend that the flow meter is checked at least weekly and compared to the paddle flow meter to ensure it is still reading accurately.

The reason for the toxicity violation was still being investigated during in the inspection. It was discussed that the relatively high total dissolved solids (TDS) that are discharged may have an impact on the toxicity. The facility's average TDS discharge from January 2012 to February 2013 was 1,250 mg/l. The max TDS value occurred in April 2012 and was 2,170 mg/l. We understand that the facility has done extensive research on reducing TDS levels but you should continue to investigate ways to improve treatment and further reduce TDS levels.

A thermometer was not observed in the auto-sampler refrigerator unit. A thermometer needs to be placed in a water bath inside the unit to ensure that proper temperature holding times are maintained during compositing. A written log recording the temperatures of the refrigerator unit should be kept.

Our completed inspection report is enclosed for your review. If you have any questions or comments, please contact me at (419) 373-3053

Sincerely,



Ryan Gierhart  
Division of Surface Water

/jlm

Enclosures

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
2ID00014	OH0122271	02/21/2013	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Worthington Steel Company 6303 C.R. 10 Delta, OH 43515	1:00 p.m.	January 1, 2012
	Exit Time	Permit Expiration Date
	3:30 p.m.	July 31, 2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ms. Elaine Veth – EHS Manager	419-822-2571	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Jeffery Leeper – Operations Manager	(419)822-2523	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>Final effluent at sampling building appeared clear with no noticeable odor.</p> <p>New clarifier was installed in July 2012. A flocculator system was installed with the clarifier that was not included in the approved Permit to Install (PTI)</p> <p>Several studies have been run on polymer addition. A new polymer has been added and in use for the last 4 months. The clarifier is still having some issue settling out the solids.</p>	
Inspector	Reviewer
 Ryan Gierhart Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
Date 3-4-13	Date 2/27/13

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..... Y
- (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:

Clarifier and new polymer have been added since last inspection.

Section F: Compliance Schedules/Violations

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

Comments/Status:

Toxicity violation and loading violations for copper and mercury. The loading violations are believed to be from the flow meter not reading correctly and giving a high reading.

Section G: Operation & Maintenance

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Operator holds unexpired license of class required by permit..... N/A  
Class:
- (f) Routine and preventative maintenance schedule/performed on time..... Y
- (g) Any major equipment breakdown since last inspection..... N
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... N
- (j) Regulatory agency notified of bypasses..... N/A  
On MORs  and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... N

**Collection System:**

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

Operation and Maintenance program is established through a computer program. No process water will be generated if the power is off.

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

**Comments/Status:**

Container of sludge is hauled out every 4-6 weeks. Sludge hauled to Williams County Landfill.

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: )
- (b) Calibration frequency adequate ..... Y  
(Date of last calibration: 4-4-12)
- (c) Secondary instruments operated and maintained..... N/A  
(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:**

Have a paddle wheel flow meter on the 601 discharge to compare flows.  
Final flow meter is an Isco 4210 ultrasonic Flow meter calibrated by maintenance every 6 months and annually calibrated by an Isco representative annually. Since the flow meter appeared to be reading high for the whole month of December it is recommended that a procedure is developed to compare the paddle wheel flow meter and the ultrasonic flow meter to ensure that the flow measurement is still accurate.

Section I: Self-Monitoring Program (cont)

**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
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N/A
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: All effluent parameters

Lab name: Jones & Henry  
Enviroscience is contracted for Toxicity testing.

*Quality Control/Quality Assurance (Jones & Henry Lab)*

- (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:**

Thermometer is needed in composite sampler refrigerator and a log book with a record of temperatures should be kept to verify proper sampling temperature is maintained.

It was noted that the facility is performing additional toxicity sampling at the final outfall. If an approved method is used to perform the tests then the data needs to be submitted into EDMR.

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001							

**Comments/Status:**

Effluent observed in final outfall sampling building appeared clear with no noticeable odor.

**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:**

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
21D00014*ED	December 2012	001	50092	Mercury, Total (Low Le	30D Qty	0.0000	.	12/1/2012
21D00014*ED	December 2012	001	01119	Copper, Total Recovers	1D Qty	0.0259	.0712	12/6/2012
21D00014*ED	December 2012	001	01119	Copper, Total Recovers	1D Qty	0.0259	.06662	12/13/2012
21D00014*ED	December 2012	001	61425	Acute Toxicity, Ceriod	1D Conc	1.0	1.12	12/13/2012
21D00014*ED	December 2012	001	01119	Copper, Total Recovers	1D Qty	0.0259	.07025	12/19/2012
21D00014*ED	December 2012	001	01119	Copper, Total Recovers	1D Qty	0.0259	.06495	12/27/2012
21D00014*ED	January 2013	001	50060	Chlorine, Total Residu	1D Conc	0.038	.19	1/24/2013