



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

Re: **Notice of Violation**
Fulton County
North Star BlueScope Steel LLC
NPDES Permit

May 28, 2013

Mr. Nathan Berry
EHS Manager
North Star BlueScope Steel LLC
6767 County Road 9
Delta, Ohio 43515

Dear Mr. Berry:

This letter is in regard to our May 16, 2013, facility inspection. You, Mr. Jake Reinbolt, Environmental Coordinator, and Mr. Mike Merillat, Nalco Operator, were present for the inspection. At the time of inspection, all wastewater treatment facilities were in proper working order. The discharge observed at the outfall 001 sampling point was clear with no noticeable odor.

A review of the discharge monitoring reports (DMRs) from April 2012 to May 2013 shows that there have been several permit limit violations. The specific instances of non-compliance are enclosed on a separate sheet. Email messages regarding the violations were received from Mr. Reinbolt on 10/22/2012, 11/20/2012 and on 11/28/2012. The violations were believed to be from the ABF sand filter not working properly. The sand filter has been rebuilt and no further phosphorus violations have occurred.

Our completed inspection report is enclosed for your records. 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

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2ID00015*FD	October 2012	001	00665	Phosphorus, Total (P)	1D Conc	1.0	1.18	10/12/2012
2ID00015*FD	October 2012	001	00665	Phosphorus, Total (P)	1D Qty	1.1	1.31399	10/12/2012
2ID00015*FD	October 2012	001	00665	Phosphorus, Total (P)	1D Conc	1.0	1.03	10/26/2012
2ID00015*FD	November 2012	001	00665	Phosphorus, Total (P)	1D Conc	1.0	1.31	11/2/2012
2ID00015*FD	November 2012	001	00665	Phosphorus, Total (P)	1D Conc	1.0	1.51	11/14/2012



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
2ID00015	OH0122386	5/16/2013	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
North Star Bluescope Steel 6767 C.R. 9 Delta OH 43515	09:00 am	May 1, 2012
	Exit Time	Permit Expiration Date
	11:15 am	April 30, 2017
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Nathan Berry, EHS, Manager Mr. Jake Reinbolt, Environmental Coordinator Mr. Mike Merillat, Nalco Operator	419-822-2339 419-822-2120	
Name, Address and Title of Responsible Official	Phone Number	
Mr. Miguel Alvarez North Star BlueScope Steel LLC 6767 C.R. 9 Delta, OH 43515	419-822-2201	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

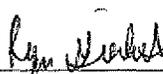
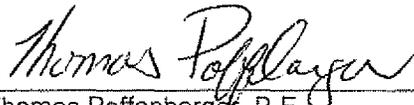
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

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

Sampling that is performed more frequently than required in the NPDES permit needs to be submitted in the EDMR system.

Thermometers should be placed in the auto-samplers to ensure proper holding temperatures are maintained.

Effluent was clear with no noticeable odor

Inspector	Reviewer
 Ryan Gierhart Environmental Specialist II Division of Surface Water Northwest District Office	 Thomas Poffenbarger, P.E. Water Quality Engineer II/Unit Supervisor Division of Surface Water Northwest District Office
5-23-13 Date	5/23/13 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) Flows and loadings conform with NPDES permit..... Y
- (c) Treatment processes are as described in permit application... Y
- (d) All discharges are permitted..... Y
- (e) Number and location of discharge points are as described
in permit..... Y
- (f) Storm water discharges properly permitted..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...NPDES permit
- (f) Permittee is in compliance with schedule..... N/A
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed Y

- i. What does the back-up power source operate.....

Dual electric feed will run entire plant.

- ii. How often is the generator tested under load.....

(b) Which components have an alarm system available for power or equipment failures.....

All treatment system components have alarms hooked up to a scadis system.

- (c) All treatment units in service other than backup units..... Y
 (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....
Software(Maximo)
 (e) Any major equipment breakdown since last inspection..... N
 (f) Operation and maintenance manual provided and maintained.... Y
 (g) Any plant bypasses since last inspection..... N
 (h) Any plant upsets since last inspection..... N

Section G: Operation & Maintenance con't

Record Keeping/Operator of Record:

- (a) Wastewater Treatment Works classification (OAC 3745-7)..... NA
 (b) Operator of Record holds unexpired license of class required by Permit..... N/A
 (c) Copy of certificate of Operator of Record displayed on-site..... N/A
 (d) Has the Operator of Record submitted an ORC Notification form.. N/A
 (e) Minimum operator staffing requirements fulfilled (OAC 3745-7.... N/A
 (f) If a Staffing Reduction plan has been approved, are the stipulations of the plan being met..... N/A
 (g) Operator of Record log book provided..... N/A
 (h) Format of log book (e.g. computer log, hard bound book)

- (i) Log book kept onsite (in an area protected from weather)..... N/A
 (j) Log book contains the following:
 I. Identification of treatment works..... N/A
 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 operator and maintenance activities (including preventative maintenance, repairs and request for repairs, process control test results, etc.)..... N/A
 iv. Laboratory results (unless documented on bench sheets)... N/A
 v. Identification of person making entries..... N/A
 (k) Has the Operator of Record submitted written notifications 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..... Y

Comments/Status:

Sand filter was rebuilt last year

Section G: Operation & Maintenance con't

Collection System:

- (a) Are there pump stations in the collection system..... N/A
 - i. How many publicly-owned pump stations equipped with permanent standby power or equivalent.....
 - ii. How many pump stations have telemetered alarms.....
 - iii. How many pump stations have operable alarms.....
- (b) Any chronic collection system overflows since last inspection..... N/A
- (c) Regulatory agency notified of all overflows..... N/A
- (d) CSOs in the collection system....if so, what is the LCTP status..... N/A
- (e) How are CSOs monitored (chalk, **block**, level sensor, etc.)..... N/A
- (f) Portable pumps available for collection system maintenance..... N/A
- (g) RDII Program established and active..... N/A
- (h) Any WIB complaint received since last inspection..... N/A
- (i) Is there a WIB response plan..... N/A
- (j) Is any portion of the collection system at or near dry weather Capacity..... N/A

Comments/Status:

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

(b) Has amount of sludge generated changed significantly since the

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

last inspection..... N/A

(c) How much sludge storage is provided at the plant.....

(d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... N/A

(e) Any complaints received in last year regarding sludge..... N/A

(f) 5/8" screen at headworks for facilities that land apply sludge..... N/A

(g) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

Comments/Status:

Lime is added in sludge holding tank. 20 yard box from sludge press taken off site daily. Sludge is non-hazardous and is sent to the Williams County landfill.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices (e.g. weir with ultrasonic level sensor):

601 discharge has a ultrasonic flow meter
 001 discharge has a magmeter

- (b) Flow meter calibrated annually Y
 (Date of last calibration: 4/12)
- (c) 24-hour recording instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) All discharged flow is measured..... Y

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
 (see GLC page)
- (d) 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

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable:
- | | |
|---|---|
| <ul style="list-style-type: none"> • Title • Scope and Application • Summary • Sample Handling and Preservation • Interferences • Apparatus and Materials • Reagents | <ul style="list-style-type: none"> • Procedure • Calculations • Quality Control • Maintenance • Corrective Action • Reference (Parent Method) |
|---|---|

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. "Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (e) Analyses being performed more frequently than required by permit. Y
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, O&G, Nitrate + Nitrite, Phosphorus, Bacteria, Low level Mercury, Ammonia

Lab name: Alloway Labs

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N/A
Date:
- (b) Were any parameters "Unsatisfactory"..... N/A
- (c) Reasons for "Unsatisfactory" parameters.....

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 2ID00015

Outfall Description: Outfall observed was clear, colorless with no noticeable odor

Receiving Stream: Maumee River

Receiving Stream Description: Stream not observed during the inspection

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

Permit # : 2ID00015
NPDES # : OH0122386

- (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

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

Form Approved
OMB No. 158-R0035

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Alternate Power Source	S	Duel Feed into plant. If both feeds are down wastewater won't be produced
Preliminary			
	EQ basin (b513)	IN	Rapid Mix tank, Black in color. Flocculant Nalclear 7763 added
	Brine Holding Tank	IN	Tank Feeds into 001 discharge.
		S	
		IN	
		I	
Primary	Clarifier(502)	IN	One Clarifier. Grey color
	Scum Removal	IN	Scum goes to oil waste tank
	Sludge Removal	IN	Sent to sludge holding tank
	Effluent	S	Slightly turbid with grey effluent
	Holding tank(507)	IN	Receives water from clarifier
	Flash mix tank (520)	IN	Ultrion 8187 Coagulant added
Sludge Disposal			
	Sludge holding tank (526)	IN	Lime is mixed in with sludge in tank with floc mixer.
	Plate Press (504)	IN	Pressed sludge fall into 20 yard trailer
	Disposal of Sludge	S	Williams County Landfill as Non-hazardous
Other			
	Flow Meter and Recorder	IN	Ultrasonic on 601 discharge magmeter on 001 discharge
	Records	M	Additional sample data needs to be submitted in EDMR
	Lab Controls	S	
	Automatic Samplers	IN	Thermometers should be placed in samplers
Secondary-Tertiary List items as required	pH adjustment tank (521)	IN	Nalmet 1689 metal precipitate polymer is added into tank. No longer used for pH adjustment
	Densadeg reaction vessel (522)	IN	Flocculant NalClear 7763 is added in rapid mix tank.
	Densadeg Clarifier (501)	IN	Flocculation mixing in tank part of flow is recycled back to reaction vessel
	Sand Filter ABF (503)	IN	Rebuilt last year
	Final pH adjustment tank (523)	IN	Nalco 7408 Sodium Biosulfite is added for chlorine removal
	Post Aeration tank	IN	Mixers provide air
	Effluent	S	Clear, colorless, with no odors