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BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of: : Director's Final Findings
LTV Steel Company, Incorporated : and Orders
3100 East 45th Street
Cleveland, Ohio 44127

Pursuant to Ohio Revised Code Section 6111.03(H), the Director of the Ohio Environmental Protection Agency hereby makes the following Findings and issues the following Orders:

FINDINGS

1. LTV Steel Company, Incorporated, hereinafter referred to as LTV, operates a wastewater treatment facility located at 3100 East 45th Street, Cleveland, Ohio.
2. This facility discharges pollutants to the Cuyahoga River and its tributaries.
3. LTV currently holds an effective OEPA NPDES Permit No. 3ID00003*JD (OH0000957) for the aforementioned discharge. This permit requires compliance with the final effluent limits by the effective date of the permit.
4. LTV cannot comply with its NPDES permit for Phenols and Ammonia-Nitrogen effluent limitations at monitoring stations 3ID00003604, 3ID00003605, and 3ID00003621 as required by federal effluent guideline limitations.
5. LTV has applied for a 301(g) variance from the previously mentioned federal effluent guideline limitations on February 17, 1983. At present, LTV's variance request is pending with U.S. EPA.
6. The Director believes the issuance of these Orders is furthering the intent of the General Assembly, that the Environmental Protection Agency will prevent and abate pollution of the environment for the health, safety, welfare, and property of the people of the state.
7. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and their relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of Chapter 6111 of the Revised Code.

ORDERS

1. If U.S. EPA denies LTV's variance request, LTV shall take measures to ensure compliance with the federal effluent guideline limitations of Permit 3ID00003*JD as expeditiously as practicable but not later than the dates developed in accordance with the following schedule.
 - A. Submit a Permit-to-Install (PTI) application and detail plans to achieve final effluent limitations at monitoring stations 3ID00003604, 3ID00003605, and 3ID00003621 within ~~6~~¹² months of U.S. EPA's final denial of LTV's 301(g) variance request.
 - B. Initiate construction within ~~12~~¹⁸ months after U.S. EPA's final denial of LTV's 301(g) variance request.
 - C. Submit report as to the permittee's progress towards meeting final effluent limitations at stations 3ID00003604, 3ID00003605, and 3ID00003621 within 24 months of U.S. EPA's final denial of LTV's 301(g) variance request.
 - D. Complete construction within 35 months of U.S. EPA's final denial of LTV's 301(g) variance request.
 - E. Attain compliance with final table effluent limitations at stations 3ID00003604, 3ID00003605, and 3ID00003621 within 36 months of U.S. EPA's final denial of LTV's 301(g) variance request.
2. Until the date the improved wastewater treatment works attain operational level as specified in the schedule indicated in Order 1, LTV shall comply with the effluent limitations and monitoring requirements contained in Attachments A, B, and C of these Findings and Orders.
3. LTV shall report any noncompliance with Order 1 or Attachments A, B, or C in accordance with Part III, Paragraph 12 of the NPDES permit referred to in Finding No. 3.
4. LTV shall submit written verification to the Northeast District Office, Ohio EPA of compliance with Orders 1B, and 1D within 14 days after compliance with each Order.
5. LTV shall comply with all terms and conditions of NPDES Permit No. 3ID00003*JD not altered by these Findings and Orders.

Richard L. Shank, Ph.D.
Director

Date

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1. During the period beginning on the effective date of these Findings and Orders and lasting until LTV is able to comply with final effluent limitations contained in NPDES Permit 3ID00003*JD, LTV is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3ID00003604. SEE PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00003*JD for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER		Concentration		Loading		Measurement Frequency	Sample Type
			30 DAY	DAILY	30 DAY	DAILY		
00530	MG/L	Residue, Total Nonfilterable	-	-	132	398	1/Week	24 Hr. Comp.
00610	MG/L	Nitrogen, Ammonia (NH ₃)	-	-	81.6	244.9	1/Week	24 Hr. Comp.
00720	MG/L	Cyanide, Total	-	-	6.30	12.60	1/Week	24 Hr. Comp.
01051	UG/L	Lead, Total (Pb)	-	-	0.63	1.89	1/Week	24 Hr. Comp.
01092	UG/L	Zinc, Total (Zn)	-	-	0.94	2.83	1/Week	24 Hr. Comp.
32730	UG/L	Phenolic 4AAP, Total	-	-	0.30	0.60	1/Week	24 Hr. Comp.
50050	MGD	Flow Rate	-	-	-	-	1/Week	24 Hr. Total

2. The pH (Reporting Code 00400) shall not be less than 6.0 S.U. nor greater than 9.0 S.U. and shall be monitored continuously. See Part II, Item D, of NPDES Permit 3ID/0003*JD for reporting requirements.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at sampling stations described in PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00003*JD.

1. During the period beginning on the effective date of these Findings and Orders and lasting until LTV is able to comply with final effluent limitations contained in NPDES Permit 3ID00003*JD, LTV is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3ID00003605. SEE PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00003*JD for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER		Concentration		Loading		Measurement Frequency	Sample Type
			30 DAY	DAILY	30 DAY	DAILY		
00530	MG/L	Residue, Total Nonfilterable	-	-	81	244	1/Week	24 Hr. Comp.
00610	MG/L	Nitrogen, Ammonia (NH ₃)	-	-	48	144	1/Week	24 Hr. Comp.
00720	MG/L	Cyanide, Total	-	-	2.7	5.5	1/Week	24 Hr. Comp.
01051	UG/L	Lead, Total (Pb)	-	-	0.27	0.82	1/Week	24 Hr. Comp.
01092	UG/L	Zinc, Total (Zn)	-	-	0.41	1.23	1/Week	24 Hr. Comp.
32730	UG/L	Phenolic 4AAP, Total	-	-	0.32	0.64	1/Week	24 Hr. Comp.
50050	MGD	Flow Rate	-	-	-	-	1/Week	24 Hr. Total

2. The pH (Reporting Code 00400) shall not be less than 6.0 S.U. nor greater than 9.0 S.U. and shall be monitored continuously. See Part II, Item D, of NPDES Permit 3ID00003*JD for reporting requirements.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at sampling stations described in PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00003*JD.

1. During the period beginning on the effective date of these Findings and Orders and lasting until LTV is able to comply with final effluent limitations contained in NPDES Permit 3ID00003*JD, LTV is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3ID00003621. SEE PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00003*JD for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER	Concentration		Loading		Measurement Frequency	Sample Type
		Other Units (Specify)	30 DAY	DAILY	30 DAY		
00530	MG/L Residue, Total Nonfilterable	-	-	167	503	1/Week	24 Hr. Comp.
00610	MG/L Nitrogen, Ammonia (NH ₃)	-	-	307	726	1/Week	24 Hr. Comp.
00720	MG/L Cyanide, Total	-	-	5.63	11.25	1/Week	24 Hr. Comp.
01051	UG/L Lead, Total (Pb)	-	-	0.56	1.69	1/Week	24 Hr. Comp.
01092	UG/L Zinc, Total (Zn)	-	-	0.84	2.53	1/Week	24 Hr. Comp.
32730	UG/L Phenolic 4AAP, Total	-	-	4.53	9.53	1/Week	24 Hr. Comp.
50050	MGD Flow Rate	-	-	-	-	1/Week	24 Hr. Total

2. The pH (Reporting Code 00400) shall not be less than 6.0 S.U. nor greater than 9.0 S.U. and shall be monitored by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at sampling stations described in PART II, OTHER REQUIREMENTS, of NPDES Permit 3ID00000*JD.