

March 2008

New Steel International

Facility Overview

New Steel International, Inc. (MMK Americas) is proposing to build and operate a new integrated steel mini-mill facility in southeast Scioto County.

The proposed facility would consist of steel melting, casting and finishing processes. Individual processes include continuous casting, vacuum degassing, acid pickling, hot and cold forming and hot dip galvanizing facilities. Slag also would be processed.

The applicant proposes to build the facility in two phases: the steel finishing portion would be built first, followed by the steel furnaces.

Wastewater Permits

Anyone wishing to discharge wastewater from a point source (such as a pipe) into a body of water must first obtain a National Pollutant Discharge Elimination System (NPDES) permit from Ohio EPA.

The NPDES permit states how much of any pollutant can be discharged, and requires regular monitoring and reporting.

The first step in the permitting process is for the applicant to complete an NPDES application and submit it to the appropriate district office. Ohio EPA then conducts a detailed technical review of the application.

Once Ohio EPA determines that the application is complete and meets all state and federal environmental standards, a permit is issued in draft form.

A public notice is then placed in the local newspaper to inform citizens of the preliminary staff determination and invite citizens to submit comments regarding the draft permit.

New Steel International, Inc. has been issued a draft wastewater permit-to-install (PTI) as well as a draft NPDES permit.

The PTI is needed to build the wastewater treatment systems and the NPDES permit regulates the discharge from the treatment systems.

The draft NPDES permit reflects two different sets of discharge limits: one when only the finishing line is operational and the other when the whole facility is operational.

The draft NPDES permit contains effluent limits for:

- total suspended solids;
- oil and grease;
- pH;
- chlorine;
- copper;
- lead;
- zinc; and
- acute toxicity.

Monitoring requirements for total dissolved solids, cadmium and mercury are included to verify that these pollutants are not being concentrated in the plant's recycling systems to levels that exceed water quality standards.

The draft permit also includes monitoring requirements for storm water runoff from industrial activity and a requirement that the company follow a storm water pollution prevention plan.

During the public comment period, Ohio EPA's Division of Surface Water **can consider** whether the source:

- protects aquatic life and public health;
- complies with all industry standards;
- employs the best available technology; and
- maintains water quality standards.

Ohio EPA's Division of Surface Water **cannot consider**:

- how popular or unpopular the facility may be;
- the location of the facility; or
- who owns the facility or their personal/professional background.

Air Permit-to-Install

An air permit-to-install (PTI) must be obtained from Ohio EPA before an air pollution source may be constructed in Ohio.

A PTI outlines technical and design requirements and pollutant limits necessary for compliance with air pollution laws and rules.

A permit-to-operate (PTO) must also be obtained from Ohio EPA before a facility can permanently operate for more than one year.

New Steel International

The first step in the air permitting process is for the applicant to submit a PTI application to the appropriate field office.

In the case of New Steel International, Inc., the PTI application was submitted to the Portsmouth Local Air Agency, which reviews air permit applications for Lawrence, Scioto, Adams and Brown counties.

Once the application is received, Ohio EPA publishes a notice in its Weekly Review that an application has been received.

The field office then performs a completeness review to determine if the application contains the information required by Ohio regulations. The field office conducts a detailed technical review of the application once it is complete.

Once the appropriate field office has reviewed the PTI application, staff will prepare a recommendation to approve or deny the permit and submit that recommendation to Ohio EPA's Central Office in Columbus.

Although some air permits are able to be issued directly as final permits, a draft permit is issued for sources subject to federal requirements and any source subject to significant public interest.

Ohio EPA's Central Office reviews the recommendation to ensure the source complies with all state and federal regulations, and employs the best available technology (BAT) for the control of air emissions.

A draft permit can then be issued which allows for a 30-day public comment period.

A public notice will be issued in a newspaper with general circulation in the county which the facility is proposed to be located, and the public is invited to submit comments to Ohio EPA regarding the draft air PTI.

The draft permit does not grant permission to begin construction.

The draft air PTI issued to New Steel International, Inc. sets limits on the following pollutants:

- particulate matter;
- fine particulate matter;
- sulfur dioxide;
- nitrogen oxide;
- carbon monoxide;
- volatile organic compounds;
- lead;
- fluoride;
- hydrogen fluorides;
- hydrochloric acid;
- sulfuric acid mist; and
- mercury.

Public Hearings

A public hearing will be held during the public comment period on March 20, 2008, regarding the draft wastewater and air permits.

In addition to the public notices that appear in the legal section of the local newspaper, Ohio EPA also mailed notices to citizens on the Agency's interested parties list for this project.

At the hearing, citizens can submit either written or oral comments to the official record.

Only comments that are relevant to the draft permits can be considered by Ohio EPA.

Comments related to the popularity of the proposed facility, local zoning, or other comments outside of Ohio EPA's statutory authority cannot be considered.

Comments received in writing at the Agency, and all written and oral comments submitted at the public hearing, are given the same consideration.

Questions and comments made during the public comment period will be responded to in a document known as a Response to Comments.

The director, after taking into consideration the recommendations of the program staff and comments presented by the public, may issue or deny the permit.

Once the director makes a final decision, the final permit decision along with the Response to Comments will be communicated to the applicant, all people who submitted comments during the public comment period, and all citizens on the interested parties list.

Final actions of the director are appealable to the Environmental Review Appeals Commission (ERAC). ERAC is separate from Ohio EPA and reviews cases in accordance with Ohio's environmental laws and rules.

Any ERAC decision is appealable to the Franklin County Court of Appeals and any order of the Court of Appeals is appealable to the Supreme Court of Ohio.

Appeals must be filed within 30 days of the issuance of the director's final action by contacting:

ERAC
309 S. Fourth St., Room 222
Columbus, OH 43215
(614) 644-8950

For more information contact the Public Interest Center at (614) 644-2160.