

**STREET ADDRESS:**

Lazarus Government Center  
122 South Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

September 21, 2006

Thomas O. Shepker  
WCI Steel, Inc.  
1040 Pine Avenue, SE  
Warren, OH 44483-6528

**Re: WCI STEEL LANDFILL,  
GROUNDWATER MONITORING ALTERNATE PARAMETER LIST**

Dear Mr. Shepker:

On March 28, the Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO) received a request to utilize an alternate parameter list for monitoring the Uppermost Aquifer System (UAS) and Significant Zone of Saturation (SZS) in accordance with Ohio Administrative Code (OAC) Rule 3745-30-08(D)(2) at the WCI Steel facility located in Trumbull County.

**OAC 3745-30-08(D)(2) states:** *“The owner or operator of a residual or industrial waste landfill may propose an alternate list of parameters to meet the requirements of paragraphs (D)(3) to (D)(6) of this rule. The list of alternate parameters shall be submitted by the owner or operator and approved by the director prior to use. The alternate parameter list shall be indicative of the waste stream(s) deposited at the landfill facility and shall be protective of human health and safety and the environment.”*

Specifically, the request proposes to replace iron, sodium, sulfate, and TDS with copper, lead, nickel, and potassium.

Ohio EPA has reviewed the applicable information, and concurs with WCI Steel's rationale in the submittal. Therefore, pursuant to OAC Rule 3745-30-08(D)(2), I hereby authorize WCI Steel to replace iron, sodium, sulfate, and TDS with copper, lead, nickel, and potassium in the list of parameters found in OAC 3745-30-08 Appendix III. As part of this authorization, WCI Steel is subject to the following condition:

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director



1. If the leachate analysis indicates that the alternate parameter list will not be capable of detecting an immediate release from the facility, WCI Steel must revert back to any or all of the following parameters: iron, sodium, sulfate, and TDS.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Scott Winkler in the Division of Solid and Infectious Waste Management at (330) 963.1220.

Sincerely,

William Skowronski,  
District Chief, Northeast District Office  
for Joseph Koncelik,  
Director, Ohio EPA

cc: Scott Hester, DSIWM, CO  
Frank Migliozi, Trumbull County Health Department