

**NUCOR**  
**BAR MILL GROUP**  
**NUCOR STEEL SEATTLE, INC.**

Date: April 26, 2016

Mr. Bob Wright  
Northwest Regional Office  
3190 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008-5452

Re: Water Compliance Inspection Report from Inspection on December 17, 2015

Dear Mr. Wright,

On December 17, 2015 the Department of Ecology (Ecology), represented by you and Ms. Jeanne Tran, conducted a stormwater inspection of Nucor Steel Seattle, Inc. (Nucor) and its subsidiary, General Steel Services of Washington, LLC (GSS). The subsequent water compliance inspection report, dated February 16, 2016, was received by Nucor on or about February 22, 2016. Nucor is concerned regarding several discrepancies between the report and Nucor's operations and requirements under its individual National Pollutant Discharge Elimination System (NPDES) permit. As you may know, Nucor takes environmental compliance extremely seriously and respectfully submits this response for the Department's consideration.

Nucor's first comment relates to the ringwalls located on the north parcel property owned by GSS. The report provides, in pertinent part:

*There are two ringwalls, circular concrete walls constructed on compacted fill material in this area. The floor of the east ringwall was sealed with concreate[d sic] in 2009. The floor of the east ringwall is composed of slag fill, with a central area approximately sixty feet in diameter covered with gravel and sand. They are for use as infiltration basins during an emergency high intensity storm event at Nucor Steel..."*

Nucor respectfully responds that the east ringwall is not used as an "infiltration basin". While the west ringwall is permitted to infiltrate stormwater in the event that Nucor's treatment system is not operational, the floor of the east ringwall is sealed and does not allow for infiltration of its contents.<sup>1</sup> Nucor has no reason to believe that the integrity of the sealed floor has been compromised. Nucor seeks to clarify the function of the east ringwall as set forth in the report and in the descriptions for photographs numbers 7 and 10.

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<sup>1</sup> The east ringwall's inability to infiltrate material is described on page 11 of the factsheet accompanying Nucor's NPDES permit (WA0031305). The fact sheet states that "the floor of Ringwall E was sealed with concrete in 2009, so that it could be used to hold sludge from various locations prior to being hauled off-site for disposal."

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Also, Nucor believes that Photo #28 is mislabeled. The description attached to Photo #28 states:

*A photo of the main baghouse. It was dusty and the ground was muddy such that vehicle track out can be observed on the ground.*

Based on a careful review of the photograph, Nucor believes that Photo #28 represents a view looking north in the slag processing building located on the southwest corner of the facility and is not the “main baghouse”. This is an important distinction, given that the “main baghouse” is an air pollution control device and emissions from that device are heavily regulated.

Finally, Nucor has considered Ecology’s recommendations to include the use of drip pans while conducting vehicle maintenance and to provide cover for the small scrap pile on the northeast side of the Nucor property. Nucor has purchased additional drip pans for the area observed during the inspection and retrained contractors and employees in that area on the use of these BMPs during vehicle maintenance. With respect to the small scrap pile, due to management and spatial limitations, Nucor does not believe that it is practicable to cover the northeast scrap pile at this time. Nucor appreciates the recommendation and will continue to evaluate methods for minimizing raw material exposure to stormwater.

Please contact me or Sean Wilson, Environmental Engineer, at (206) 933-2223 if you have any questions or would like additional information. As always, Nucor appreciates this opportunity to provide these clarifications and response.

Respectfully,



Patrick Jablonski  
Environmental Manager  
Nucor Steel Seattle, Inc.