



STATE OF MISSISSIPPI  
PHIL BRYANT  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
GARY C. RIKARD, EXECUTIVE DIRECTOR

June 30, 2015

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Stan Adkins  
Steel Dynamics Columbus  
PO Box 1467  
Columbus, MS 39703

**Re: Steel Dynamics Columbus  
Agreed Order No. 6536 15**

Mr. Stan Adkins:

Enclosed you will find a copy of Agreed Order No. 6536 15, which has been executed by the Executive Director of the Mississippi Department of Environmental Quality, Gary Rikard, on behalf of the Mississippi Commission on Environmental Quality.

The enclosed Order assesses a civil penalty. The penalty payment, when due, should be made by check payable to the Mississippi Department of Environmental Quality and returned in the enclosed, self-addressed envelope to the MDEQ Fees Division at P.O. Box 2339, Jackson, MS 39225.

If you have any questions regarding your obligations under the enclosed order, please contact Mohammad Yassin at (601) 961-5195.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Sanders".

Chris Sanders, P.E.  
Chief, Environmental Compliance and Enforcement Division

Enclosure  
cc: Mohammad Yassin

Agency Interest No. 20296  
ENF20150002

BEFORE THE MISSISSIPPI COMMISSION  
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

COMPLAINANT

6536 15

VS.

ORDER NO. \_\_\_\_\_

STEEL DYNAMICS COLUMBUS, LLC  
1945 AIRPORT ROAD  
COLUMBUS, MISSISSIPPI 39701

RESPONDENT

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), Complainant, and Steel Dynamics Columbus, LLC, Respondent, in the above captioned cause and agree as follows:

1.

By letter dated February 25, 2014, Respondent was contacted by Complainant and notified of the following violations at its facility located at 1945 Airport Road, Columbus, Mississippi in Lowndes County ("Site"):

- A. In violation of Mississippi Hazardous Waste Management Regulations (MHWMR) 262 [40 C.F.R. § 262.34(a)(3)] - Containers containing hazardous waste must be labeled or marked clearly with the words "Hazardous Waste." Respondent used a vacuum truck to clean up inside and around the railcar loading building. The waste was placed in 20-yard roll off containers. The truck needed to have a hazardous waste label.
- B. In violation of MHWMR 262.34(a)(4) and MHWMR 265 [40 C.F.R. § 265.31] - Generators are required to maintain and operate their facilities to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste. Three trash

cans outside of the railcar loading building contained cloth rags and face masks contaminated with K061 waste.

- C. In violation of MHWMR 262.34(a)(1)(ii) and MHWMR 265 [40 C.F.R. § 265.195] - The owner or operator must inspect tanks at least once each operating day. Discrepancies were noted in the daily inspections of the tanks at the galvanizing lines. There were missing inspections for January 2012, April 2012, and July 2012.
- D. In violation of MHWMR 262 [40 C.F.R. § 262.34(b)] - A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 270 unless it has been granted an extension to the 90-day period. The inspection log for the roll-off boxes outside of the railcar loading area revealed two times the facility exceeded the 90-day storage limit.
- E. In violation of MHWMR 264 [40 C.F.R. §264.11] - Every facility owner or operator must apply to EPA for an EPA identification number in accordance with the EPA notification procedures (45 FR 12746). Respondent accepted solvent rags along with oily rags from Siemens located at 1961 Airport Road MS9, Columbus, MS 39701, and placed them into one of three oily rag bins on site. Respondent was therefore accepting hazardous waste and acting as a Treatment Storage and Disposal Facility.

By letter dated December 19, 2014, Respondent was contacted by Complainant and notified of the following violation(s) at the Site:

- F. Respondent failed a stack test conducted on December 16, 2014. The stack test results indicated that the Respondent was in violation of the Title V Operating Permit No. 1680-00064 limits as detailed below:

Emission Point	Parameter	Emission Limit	Reported Emission	Percent Deviation
AA-002	Sulfur Dioxide (SO <sub>2</sub> )	0.28 lb/ton	0.41 lb/ton	46 %
AA-002	Sulfur Dioxide (SO <sub>2</sub> )	97.72 lb/hr	101.64 lb/hr	4.0 %
AB-002	Sulfur Dioxide (SO <sub>2</sub> )	0.28 lb/ton	0.29 lb/ton	3.6 %
AB-002	Nitrogen Oxides (NO <sub>x</sub> )	0.37 lb/ton	0.39 lb/ton	5.4 %

By letters dated December 21, 2014 and January 2, 2015, and an email dated May 20, 2015, Respondent alleged to have implemented corrective action measures that have resulted in a return to compliance with the applicable permits and regulations.

2.

In lieu of a formal enforcement hearing concerning the violations listed above, Complainant and Respondent agree to settle this matter as follows:

Respondent agrees to pay and Complainant agrees to accept a civil penalty in the amount of \$76,110.00. Respondent shall pay this penalty to MDEQ within forty-five (45) days after this Agreed Order has been executed by the MDEQ Executive Director. The settlement payment shall be submitted to:

Mississippi Department of Environmental Quality  
 Attn: Jennifer Parish  
 P.O. Box 2339  
 Jackson, MS 39225

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.


Nothing contained in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

5.

Respondent understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. § 49-17-31, and that it has made an informed waiver of that right.

ORDERED, this the 23<sup>rd</sup> day of JUN 5, 2015.

MISSISSIPPI COMMISSION ON  
ENVIRONMENTAL QUALITY

BY:   
GARY C. RIKARD  
EXECUTIVE DIRECTOR  
MISSISSIPPI DEPARTMENT  
OF ENVIRONMENTAL QUALITY

AGREED, this the 15<sup>th</sup> day of June, 2015.

STEEL DYNAMICS COLUMBUS, LLC

BY: Madhu Ranade

TITLE: Vice President & General Manager

STATE OF Mississippi

COUNTY OF Monroe

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Madhu Ranade who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the VP + General Manager of Steel Dynamics Columbus, LLC and is authorized to sign and enter this Agreement.

SWORN AND SUBSCRIBED BEFORE ME, this the 15 day of June, 2015.

Tammy Jones  
NOTARY PUBLIC

My Commission expires: June 13, 2016

