ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Lanny Sasser
Environmental Scientist, Sr.
Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, Alabama 36110

2) Facility Information

SSAB Alabama Inc. (SSAB)
12400 Highway 43 North
Axis, Mobile County, Alabama 36505

EPA ID Number: ALR000014183
NAICS Code(s): 331111, 332811

Telephone: (251) 264-3345
Website: ssab.us

3) Responsible Officials

Mr. Tony Cooper
Senior Environmental Manager
Phone: (251) 264-3345
Email: tony.cooper@ssab.com

4) Inspection Participants

Mr. Tony Cooper, Senior Environmental Manager – SSAB
Mr. Brian Austin, Environmental Coordinator – SSAB
Ms. Terry Brooks, Environmental Specialist – SSAB
Mr. Lanny Sasser – ADEM

5) Date of Inspection

June 17, 2021

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

In 1998 IPSCO Inc. began construction of a steel mini-mill at the site with a twin-shell, triple electrode, electric- arc furnace (EAF) and twin single electrode, ladle metallurgy furnaces (LMFs). In 2001, the mini mill began production of discrete plate and coiled hot rolled plate steel. In 2007, a one hundred thousand ton quench line for the production of Hardox® and Weldox® (specialty steels) was added to the facility. In 2008, SSAB Swedish Steel AB (headquarters in Stockholm, Sweden) purchased IPSCO Inc. including this facility. SSAB recently added a 300 thousand ton capacity quench line for specialty steel production. SSAB currently has approximately 560 SSAB and 340 contractor employees working in four shifts, twenty-four hours a day, seven days a week; twenty-five employees work directly or indirectly managing hazardous waste.

Scrap steel (main feedstock) and secondary materials are received from an on-site scrap yard operated by Tube City, IMS and are loaded (charged) by overhead crane into either the EAF's east or west shell. The charge is preheated (natural gas) in one shell while the triple arc electrode melts the pre-heated scrap steel in the other shell. The EAF electrode pivots from the east to the west shell on a continuous cycle. After the scrap steel has melted, it is tapped into ladles and taken by a shot rail or by overhead crane to one of the two LMFs. In the LMFs, alloying elements are added; carbon content adjusted; the sulfur level is reduced; and the steel is sampled. After leaving the LMFs, the molten steels are taken either to the single strand caster (caster) or to one of the twin vacuum tank degassers (VTDs) and then to the caster. The caster shapes and cuts the steel into thin slabs. Some of the slabs of metal are reheated and rolled onto spools in the reheat furnace and rolling mill. In the VTDs, a vacuum is pulled on the vessel of molten steel to remove all of the air and argon gas is added, to remove impurities, while the molten steel is stirred. The steel slabs from the VTD process are taken to one or the other of the two specialty steel quench lines.

Emissions from the electric arc furnace are controlled by a baghouse system. The baghouse dust is accumulated in an on-site storage silo until it is shipped by rail to Steel Dust Recycling for metals recovery. Other hazardous wastes generated on-site are accumulated in three central accumulation areas (CAAs). The on-site solid and hazardous waste management vacuum services are performed by Ranger Environmental; hazardous wastes are transported by Greer Enterprises (drums) or Ranger (roll-off containers). In an on-site garage and yard area, Tesco performs maintenance on the facility's vehicles and equipment. Used oil generated is stored in an on-site used oil storage tank and is collected and transported by Aaron Oil Company, Inc. to its Mobile facility. Spent fluorescent bulbs are handled as universal waste.

According to the facility's most recent submittal of ADEM Form 8700-12 (received by the Department

on November 25, 2020), SSAB is a large quantity generator of hazardous waste, used oil (UO) generator and a small quantity handler of universal waste (UW).

9) Observations

I arrived at the facility at approximately 12:00 p.m., checked in at the front desk and was greeted by Mr. Cooper. I identified myself and explained the purpose of the inspection. Mr. Cooper escorted me to his office where we were joined by Mr. Austin and Ms. Brooks. After another round of introductions, I conducted the opening conference.

Following the opening conference, I was provided the following documents for review: 8700-12 Notification of Regulated Waste Activity; Biennial Report; Contingency plan, quick reference guide and proof it had been sent to local emergency responders; Hazard waste manifests (2020-present); 90-Day hazardous waste accumulation areas weekly inspections (2020-present); and Training records for hazardous waste personnel.

No areas of concern were noted during the record review.

Following the record review, I was escorted on a facility tour by Mr. Austin during which the following regulated units were inspected.

A) Warehouse

Shipping and receiving for SSAB. The UW storage was located in this area. Three UW containers and one satellite accumulation (SA) bulb crusher were observed in this area at the time of the inspection. All containers were closed, in good condition and appropriately labeled.

No areas of concern were observed in these areas.

B) HW 1 (Oil Storage Building)

90-Day hazardous waste storage area that also houses SSAB's UO storage area. The area had appropriate security and signage. The secondary containment was bermed, coated and free of cracks or gaps. Nine 55-gallon drums, one 55-gallon SA aerosol punch and drain station and ten UO containers were observed in this area at the time of the inspection. All containers were closed, in good condition and appropriately labeled.

No areas of concern were noted during this part of the inspection.

C) Finishing Department

SSAB's paint line. Five 55-gallon SA drums of paint waste, aerosols and rags were observed in this area at the time of the inspection. All containers were closed, in good condition and

appropriately labeled.

No areas of concern were noted during this part of the inspection.

D) HW 2 (Baghouse East Storage)

Two 20 yard roll-offs and seven 20 yard vac boxes were located in this 90-Day lay down yard. All containers were closed, in good condition and appropriately labeled. The area was chained off and had appropriate signage.

No areas of concern were noted during this part of the inspection.

E) HW 3 (Baghouse Compactor)

One 20 yard roll-off and one hazardous waste compactor were observed in this area at the time of the inspection. All containers were closed, in good condition and appropriately labeled. The area was chained off and had appropriate signage.

No areas of concern were noted during this part of the inspection.

F) HW 4 (Baghouse Silo Containment Pad)

One 20 yard dust collection vac box was observed in this area at the time of the inspection. The container was closed, in good condition and appropriately labeled. The area was chained off and had appropriate signage.

No areas of concern were noted during this part of the inspection.

G) HW 5

90-Day hazardous waste storage area located near the central laydown yard. The laydown yard is an area where "plant trash" bins are taken, dumped and sorted. Any material that can be recycled is taken out and placed in other bins for proper handling. The material left is compacted into roll-offs for disposal at a municipal solid waste landfill. The 90-Day area had appropriate signage and was secure. No waste was present in this area at the time of the inspection.

No areas of concern were noted during this part of the inspection.

10) Summary

Based on the observations made during the inspection, SSAB appears to be a large quantity generator of hazardous waste, a UO generator and a small quantity handler of UW.

At the conclusion of the inspection, I held a closing conference with SSAB's representatives, Mr.

Cooper, Mr. Austin and Ms. Brooks. During the meeting, I reviewed and discussed my observations, presented my findings to SSAB's representatives, and provided them with an opportunity to ask questions. At the conclusion of the conference, I prepared a *Preliminary Inspection Report* to the facility. Mr. Cooper acknowledged receipt by signing the form. The "original" signed form was given to Mr. Cooper for the facility's records. I concluded the closing conference and departed the facility at approximately 2:46 p.m.

11) Signed

Lanny Sasser

Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

June 28, 2021
Date

12) Concurrence

Brent A. Watson

Brent A. Watson, Chief
Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Land Division

June 28, 2021
Date

Attachments:

A) Photo Log
B) Preliminary Inspection Report

ATTACHMENT A:
PHOTO LOG

SSAB Alabama Inc.

Warehouse (UW Storage)

HW 1 90-Day Storage

Drums Stored in HW 1

UO Stored in HW 1

ATTACHMENT B:
PRELIMINARY INSPECTION REPORT

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PRELIMINARY INSPECTION REPORT

FACILITY NAME		EPA ID NUMBER
SSAB Alabama Inc.		ALR000014183
STREET ADDRESS	CITY	COUNTY / ZIP CODE
1400 HWY 43 N	Axis	Mobile 36505
TELEPHONE NO.	DATE OF INSPECTION	PAGE NO.
(251) 626-3315	6/17/21	1 1

OBSERVATIONS

No areas of concern noted during the inspection.

This information is provided to call your attention to these areas of potential noncompliance at the earliest possible time. This report does not constitute a Notice or Violation nor a compliance order issued pursuant to 22-30-19 of the Alabama Hazardous Waste Management and Minimization Act and may not be a complete listing of all areas of noncompliance which may be identified as a result of this inspection.

If you have any questions or wish to discuss this action you may contact Lanny Sasser

by telephone at (334) 271-7768 or by email at MSasser @adem.alabama.gov

Signature of Preparer: Lanny Sasser Date 6/17/21

The undersigned person hereby acknowledges that he/she received a copy of this report and has read and understands the same.

SIGNATURE	PRINT NAME
Tony Cayer	Tony Cayer
TITLE	DATE
Environmental Manager	6/17/2021

ADEM Land Division Form MH 6/2019