

US EPA ARCHIVE DOCUMENT

RCRA SHOWCASE PILOT MULTI-REGIONAL

NUCOR STEEL MINI-MILLS

Innovation

The cleanup of the Nucor Steel Mini-mills (which are not listed on the RCRA GPPRA Corrective Action Baseline) will take place under a federal consent decree. Although closure of regulated units has taken place at several of the facilities in the past, the Nucor Consent Decree will provide for overall resolution of the environmental concerns at these facilities, and is the first comprehensive, multi-media settlement in the steel mini-mill industry. The Nucor Consent Decree serves as a potential model for addressing environmental compliance and cleanup of multi-state, multi-regional industrial sites. The eight (8) mini-mills are located in six (6) states and five (5) EPA regions. The cleanups will take place sequentially, in a prioritized process which will be modified as necessary to effect continuous improvement.

Expected Benefits

These are currently active facilities, with ongoing operations. It is expected that the cleanup will not constrain Nucor's ability to make full use of its property. The multi-facility approach provides for a consistent, effective, and final cleanup at all of Nucor's mini-mills, on a prioritized basis. The similarities of the mini-mills will allow the Agencies to benefit from lessons learned as the cleanups progress. Nucor has proposed a uniform approach to the cleanups, which will hopefully facilitate review and approval and accelerate the completion of the projects. Up-front participation of facility representatives, federal and state regulators prior to submittal of plans and reports will likely reduce the amount of revision and re-review, reducing the amount of resources necessary to oversee and implement the Decree.

Stakeholder Involvement

The states, regions, and Nucor will continue to actively participate in the project. The Coordinating Committee includes all Project Coordinators, an EPA Headquarters representative, a Regional-lead representative, a Nucor representative, and an Independent Project Oversight Director. Typical corrective action public participation activities are required by the Decree.

Pilot Participants

Participants include the EPA Regions 4, 5, 6, 7, and 8, along with EPA Headquarters, and the states of Arkansas, Indiana, Nebraska, South Carolina, Texas, and Utah. Those participants serving as technical lead for the corrective actions are representatives from the Arkansas Department of Environmental Quality, the Indiana Department of Environmental Management, the South Carolina Department of Health and Environmental Control, the Utah Department of Environmental Quality, and EPA Regions 6 and 7.

Potential for Further Application

This model could apply to any entity with facilities in multiple regions and states.

Proposed Project Milestones

Initial corrective action milestones for the project are keyed to consent decree entry, and further milestones are keyed to regulatory agency notification and approved workplan schedules. The Nucor Consent Decree was entered on June 21, 2001, but the judge agreed to Nucor’s request to begin the timeline on July 1, 2001 (this would allow activities to sync with Nucor’s fiscal year quarters).

Milestone	Deadline
Submit Comprehensive Initial Assessment	Within 240 days of consent decree entry (on or before 2/25/02)
Submit RFA Workplan for highest priority facility	Within 60 days of notice from Project Coordinator, but no earlier than within 300 days of consent decree entry (no earlier than 4/26/02)
Implement RFA Workplan	Within 30 days of Project Coordinator approval
Submit Draft RFA Report	In accordance with approved RFA Workplan schedule
Submit RFI Workplan for Norfolk, Nebraska facility	Within 60 days, but no earlier than within 300 days of consent decree entry
Submit RFI Workplan for remaining seven (7) mini-mills (in prioritized order)	Within 60 days of written notice from Project Coordinator
Submit RFI Report	In accordance with approved RFI Workplan schedule
Submit CMS Workplan	Within 90 days of notice from Project Coordinator
Submit CMS Report	In accordance with approved CMS Workplan schedule
Submit CMI Workplan	Within 90 days of notification of the selected corrective measure(s) by the Project Coordinator
Submit CMI Completion Report	In accordance with approved CMI Workplan schedule

Facility Descriptions

Steel mini-mills receive, melt and cast scrap steel and scrap substitutes into steel beams, shapes, bars, sheets, plate and products, or rolls, which are further processed into finished steel products. There are eight Nucor mini-mills that will conduct RCRA Corrective Actions as part of the Decree, in the following locations: 1) Berkeley/Huger, South Carolina; 2) Blytheville, Arkansas; 3) Crawfordsville, Indiana; 4) Darlington, South Carolina; 5) Jewett, Texas; 6) Norfolk, Nebraska; 7) Armorel, Arkansas; and 8) Plymouth, Utah. As a result of its operations, Nucor’s mini-mills generate K061 dust, a RCRA hazardous waste, and other hazardous and solid wastes attendant to the steel manufacturing and fabrications processes. The Corrective Actions

are primarily to address releases of K061 dust from dust management activities. The investigations will be site-wide and comprehensive.

Progress Measurements

Due to the projects' complexity, Nucor and EPA recognize that a phased approach to facility assessment and investigation is appropriate. To promote effective communication, Nucor's project managers and technical consultant(s) are to meet periodically with appropriate EPA and/or state project coordinators. Entry of the decree triggers the project timetable; Nucor will first submit a comprehensive initial assessment and corrective action schedule for all the mini-mills. This initial schedule is to include a priority-based timeline for interim measures and further investigations. Further submittals are keyed to regulatory agency demands.

Nucor is required by the Decree to submit progress reports covering its activities and findings on a quarterly basis. Nucor is also required to develop and implement a program for monitoring and documenting its compliance with the terms of the Decree, which include the Corrective Action activities.

Project Oversight

To facilitate the eight (8) corrective actions, occurring in the six (6) states, EPA and Nucor have agreed to establish a Coordinating Committee to assist with the overall implementation of the corrective action activities required pursuant to the Decree. The Committee consists of project coordinators from the states and regions, a representative from EPA Headquarters, Nucor, and an Independent Project Oversight Director.

The Coordinating Committee will strive to identify and resolve cleanup issues, both administrative and technical, to avoid project delay. The Committee will be a vehicle for ongoing exchange of technical information among the project coordinators, and will assist with the scoping and development of an overall schedule for implementation of the work. The Committee can also ensure that the overseeing agencies are interacting with the facilities in a consistent manner, while taking into account site-specific differences that present diverse technical challenges.

Key Regional/State Contacts

See attached contact list.

Further Informaton on this Application

Contact John DeLashmit, EPA Region 7, delashmit.john@epa.gov, (913)551-7821.

ATTACHMENT 1

Nucor Corrective Action Contacts List

Mill Location	Contact Name	Contact Address	Contact Telephone No.	Contact email
Darlington, SC	* Paul Wilkie Jr.	Division of Waste Management South Carolina Department of Health & Environmental Control 2600 Bull St. Columbia, SC 29201	803-896-4177	wilkiepb@columb34.dhec.state.sc.us
	Ken LaPierre	US EPA R4 61 Forsyth St., SW Atlanta, GA 30303-8960	404-562-8570	lapierre.kenneth@epa.gov
Berkeley/ Huger, SC	* Paul Wilkie Jr.	Division of Waste Management South Carolina Department of Health & Environmental Control 2600 Bull St. Columbia, SC 29201	803-896-4177	wilkiepb@columb34.dhec.state.sc.us
	Ken LaPierre	US EPA R4 61 Forsyth St., SW Atlanta, GA 30303-8960	404-562-8570	lapierre.kenneth@epa.gov
Crawfordsville, IN	Jonathan Adenuga	US EPA R5 DRE-9J 77 West Jackson Blvd. Chicago, IL 60604-3507	312-886-7954	adenuga.jonathan@epa.gov

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Hickman, AR	* Derick Warrick	Arkansas Department of Environmental Quality Box 8913 Little Rock, AR 72219	501-682-0838	warrick@adeq.state.ar.us
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Jewett, TX	Todd Counter	Texas Natural Resources Conservation Commission PO Box 13087 Austin, TX 78711-3087	512-239-2591	ccounter@tnrcc.state.tx.us
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Norfolk, NE	*Ken Herstowski	US EPA R7 ARTD/RCAP 901 N. 5 th Street Kansas City, Kansas 66101	913-551-7631	herstowski.ken@epa.gov
	Ed Southwick	Nebraska Department of Environmental Quality 1200 N Street The Atrium, Suite 400 Lincoln, NE 68509	402-471-4875	ed.southwick@ndeq.state.ne.us
Plymouth, UT	Janice Pearson	US EPA R8 8ENF-T 999 18 th Street, Suite 300 Denver, CO 80202-2466	303-312-6354	pearson.janice@epa.gov
	Scott Anderson	Utah Department of Environmental Quality Division of Solid & Hazardous Waste PO Box 144880 Salt Lake City, UT 84114-4880	801-538-6784	sanderso@deq.state.ut.us
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