



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Allen County  
Superior Forge & Steel Corp.  
Premise #0302020300  
Notice of Violation (NOV/non-HPV)

July 11, 2011

Mr. Michael Nigh, Health and Safety Manager  
Superior Forge & Steel Corporation  
1820 McClain Road  
Lima, Ohio 45804

Dear Mr. Nigh:

This letter shall serve as a follow-up to the inspection Jeff Skebba, and I, of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO), conducted on June 16, 2011, of Superior Forge and Steel Corporation. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

1. The 2010 Annual Title V Compliance Certification and the Title V Quarterly Deviation Report for the first quarter of 2011 were due by April 30, 2011 and submitted in Air Services on May 5, 2011.
2. The reports listed above were submitted in a form that when Ohio EPA staff attempted to open these, the reports were not legible. Prior to the inspection, Ohio EPA staff contacted you by phone to attempt to get this issue resolved. No action by the company has yet occurred. At the inspection meeting, the Ohio EPA representatives were given a hard copy of the report but the issue is still not resolved. At this time, Superior Forge and Steel is in violation of Part I.A.c.ii and A.12 of the Title V General Terms and Conditions, and ORC 3705.06 for failing to resubmit a properly formatted annual compliance certification and quarterly deviation report through Air Services. Please note that these are different reports and must be submitted separately in Air Services.
3. The hard copy of the first quarter 2011 Title V deviation report for emissions unit P002, electric arc furnace baghouse, noted no deviations but a review of the onsite pressure drop monitoring data showed potential deviations on 1/9/11, 1/21/11, and 2/8/11.

Mr. Michael Nigh, Health and Safety Manager

July 11, 2011

Page 2

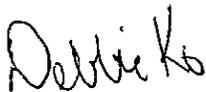
The allowable pressure drop range for the baghouse is 1 to 7 inches water column. On those dates, the pressure drop was noted as 8 inches water column. No additional notes were provided on the data sheets for those dates. The company is in violation of the Title V reporting requirements and ORC 3705.06 for failing to properly document and report deviations of the baghouse pressure drop in its quarterly deviation report.

By no later than July 15, 2011, the company's 2010 Annual Compliance Certification and the first quarter 2011 Title V deviation report must be resubmitted through Air Services while a written response to this letter is requested by July 22, 2011. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future.

Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I would like to take this opportunity to thank you for escorting us around the facility. Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address or call (419) 373-3106.

Sincerely,



Debbie Ko  
Division of Air Pollution Control

/llr

pc: ~~DAPC-NWDO File~~

ec: William MacDowell, U.S. EPA Region V  
Tom Kalman, DAPC-CO  
Jennifer Jolliff, DAPC-NWDO  
Jerry Fuller (jfuller@venturaengineering.com)