



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korfeski, Director

Re: Auglaize County (Uniopolis)
OmniSource (St. Marys)
03 06 01 0134
WARNING LETTER

CORRECTED COPY

September 30, 2010

Mr. Rob Carman, Plant Manager
Omnisource - St. Marys Iron and Steel
4575 County Road 33A
St. Marys, Ohio 45885

Dear Mr. Carman:

As you know, I made an unplanned stop at your facility on July 14, 2010, and then made a planned follow-up visit on August 25, 2010, when I spoke with you and other OmniSource personnel. The following summarizes items we discussed:

1. Your facility cuts miscellaneous large metal scrap. On my July 14, 2010 visit, some of the conventional torch cutting appeared to involve scrap metal that had rubbery -oily components /residues to it that would ignite upon the torch hitting them.
2. The 'conventional' propane torches (which should be noted that, at a distance, appear as similar equipment as the 'jet torches') used at various places out in the yard, are seen at times to generate dirty-orangish plumes. These plumes, although apparently less substantial than the plumes formerly generated by the uncontrolled jet torching, can be substantial enough so as to be visible from out on the public highway at the facility entrance, a distance of perhaps 100 yards or so. The plumes seemed to be caused in much the same way as with the jet torches, i.e. a torch 'cut' would typically start at the top being a fairly clean cut, and as the cut would approach the bottom, the torch would literally be hitting the ground as well as the scrap part, and the dirty-orangish plume would appear.

Regarding item 1, as was discussed in a past correspondence with the company, although OAC 3745-19-03(B)(2) exempts the smoke emissions from certain acetylene torch activities (note: the company's torches are propane), it in no way exempts any fire that is started by such torch cutting operations. Such fire ignitions, if allowed to simply burn out, are a violation of this OAC section.

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Regarding item 2, past records here at NWDO indicate that the conventional torches were assumed to be 'de minimis' operations, exempt from Ohio EPA air pollution requirements under OAC 3745-15-05. Please also note that the generation of the 'plumes' from these torches may jeopardize the continuing consideration for de minimis status for these operations.

Please note, that while the company is not being cited for violations for the items in this letter at this time, this does not preclude the Ohio EPA from future closer examination of compliance regarding these or any other items at the facility, and upon further evaluation and/or as new information becomes available, does not preclude the Ohio EPA from arriving at a different future compliance determination.

Should the company have any questions and/or comments, I may be reached at (419) 373-3117. I may also be contacted electronically by E-mail at: paul.chad@epa.state.oh.us

Sincerely,



Paul Chad
Division of Air Pollution Control

/llr

pc: Mark Budge, DAPC-NWDO
DAPC-NWDO File