



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Fulton County
0326000073
North Star Steel
Stack Test
HPV - GC8
Notice of Violation

April 16, 2008

CERTIFIED MAIL

Ms. Melissa Dotson
North Star Bluescope Steel LLC
6767 County Road 9
Delta, Ohio 43515

Dear Ms. Dotson:

The stack test conducted on February 13-15, 2008, on Ohio EPA emissions unit Numbers P901-P903, has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

Critical Test Data*
(In Three Run Averages)

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
PM ₁₀	0.0015 gr/dscf	0.0018 gr/dscf	275.3 TPH	315 TPH
Hg	0.001044 lb/hr (stack 1) 0.022778 lb/hr (stack 2)	0.050 lb/hr (stack 1) 0.045 lb/hr (stack 2)	285.2 TPH	315 TPH
SO ₂	35.0 lbs/hr	78.8 lbs/hr	277.5 TPH	315 TPH
NO _x	39.6 lbs/hr	179.6 lbs/hr	277.5 TPH	315 TPH
CO	1478.1 lbs/hr	2362.5 lbs/hr	277.5 TPH	315 TPH
VOC	130.56 lbs/hr	110.3 lbs/hr	277.5 TPH	315 TPH

* All test results are for emissions units P901-P903 combined.

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This emissions test indicates emission units P901-P903 were being operated in exceedance of their combined allowable mass emissions rate for volatile organic compounds (VOC). This is a violation of Permit to Install (PTI) #03-17004, term and condition A.1.1. of the Title V permit, and Ohio Revised Code (ORC) 3704.05.

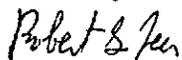
We request the company submit a compliance plan and schedule which details the mechanism and the time frames necessary to bring these emissions units into compliance. At a minimum, this plan should include proposed milestone dates by which the compliance problem(s) are identified and resolved, and if necessary, when a retest on these emissions units can occur. We also request the company submit this compliance plan, within 30 days of the date of this letter.

In addition to the above information, the company needs to re-evaluate the lb/s ton VOC emissions factor used in establishing the VOC mass emissions limit in PTI #03-17004 (0.35 lbs VOC/ton of liquid steel produced). Although not established in the permit as an emission limit, this value is part of the Best Available Control Technology (BACT) determination in PTI #03-17004, and is used throughout the permit for determining VOC emissions. The calculated value from the emissions test is significantly greater than this emission factor (0.47 lbs VOC/ton of liquid steel produced).

The stack test conducted on February 13-15, 2008, indicated Ohio EPA emissions units P901-P903 were operated at 88.1 % of capacity during testing (for the portion associated with the gaseous pollutants). Ohio EPA and USEPA will typically not accept results at less than the minimum capacity for demonstrating compliance, unless the company is willing to agree to not operate the emissions unit in exceedance of the rate at which it was tested. As part of the company's response to this letter, it is necessary to update the Ohio EPA on the status of the recent modifications done to these emissions units, and to verify that these emissions units can be operated at the current maximum permitted capacity. If it is determined that the current permitted capacity does not reflect the current operating capacity of the unit, supporting documentation should be included in the company's response.

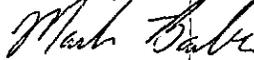
The submission of information to respond to this letter does not constitute waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date. Should you have any questions or comments concerning this letter, please feel free to contact Robert at (419) 373-3139 or Mark at (419) 373-3131.

Sincerely,



Robert G. Teer
Division of Air Pollution Control

Sincerely,



Mark Barber
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Mark Barber, DAPC-NWDO
Tom Kalman, DAPC-CO
Robert Teer, DAPC-NWDO
Tom Sattler, DAPC-NWDO
Lisa Holscher, US EPA
DAPC-NWDO File
Stack File

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NORTH STAR
 BLUESCOPE STEEL LLC
 6767 COUNTY ROAD 9
 DELTA, OHIO 43515

PS Form 3800, August 2003 See Reverse for Instructions

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1. Article Addressed to:
 MRS MELISSA DOTSON
 NORTH STAR BLUESCOPE STEEL LLC
 6767 COUNTY ROAD 9
 DELTA, OHIO 43515

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