



Environmental
Protection Agency

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

Re: Richland County
OmniSource Corporation
1500 Old Bowman St.
Mansfield, OH 44903
Premise # 03.70.01.0201
Notice of Violation (Non-HPV)

July 12, 2011

CERTIFIED MAIL

Mr. Paul Shatlock, General Manager
OmniSource Corporation
1500 Old Bowman Street
Mansfield, Ohio 44903

Dear Mr. Shatlock:

This letter shall serve as follow-up to an inspection conducted on June 6, 2011, by this writer and Mr. Chad Winebrenner, on June 8, 2011, by this writer and Ms. Jennifer Jolliff and on June 23, 2011, by this writer, of the above-referenced facility. The inspection was conducted as part of an ongoing investigation regarding concerns stemming from nuisance dust along Old Bowman Street Road and Shulties Drive, in Mansfield, Ohio.

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

1. On the dates above, I visited the area and found the public roadway directly in front of the facility to have been recently swept and watered, however, the portions of the roadway farther north of Omnisource were still dirt covered, dry and producing visible emissions. The dirt/earth from the facility carried onto the roadway approximately 0.5 miles beyond where the facility stopped watering and sweeping the roadway. Also, while it was apparent that the public roadway had been swept and water had been applied, over a several hour time frame on both dates, no water was seen being applied to the unpaved roadways on the company's property on either side of Old Bowman Street Rd. On both occasions the weather included no rain for the last several days and relatively high temperatures.

2. US EPA Method 22 observations were conducted on the unpaved roadways south of Old Bowman Street Rd on June 6, 2011. The accumulated visible emissions time of three minutes and eighteen seconds was recorded over a thirteen minute observation period. This is a violation of visible emissions limit established in Ohio Permit-to-install and operate (PTIO) 1.b)(1)a. of PTIO P0105616, issued October 22, 2009, for emissions unit F001, Ohio Administrative Code (OAC) rule 3745-31-05 and Ohio Revised Code (ORC) 3704.05. This is also a violation of Ohio EPA's Findings and Orders issued on August 17, 2010, specifically section V.3.
3. US EPA Method 22 observations were conducted on the unpaved roadways south of Old Bowman Street Rd on June 8, 2011. The accumulated visible emissions time of three minutes and ten seconds was recorded over a twelve minute time period. This is a violation of visible emissions limit established in PTIO 1.b)(1)a. of PTIO P0105616, issued October 22, 2009, for emissions unit F001, OAC rule 3745-31-05 and ORC 3704.05. This is also a violation of Ohio EPA's Findings and Orders issued on August 17, 2010, specifically section V.3.
4. OmniSource is in violation of OAC rule 3745-17-08(B)(9) for failing to promptly remove, in such a manner as to minimize or prevent resuspension, earth or other material from paved streets onto which it has been deposited by its activities. This is also a violation of term 1.b)(2)e. of PTIO P0105616, issued October 22, 2009, for emissions unit F001, OAC rule 3745-31-05 and ORC 3704.05.
5. Storage piles at the facility were observed on both days to be producing visible emissions from both the handling of the materials in question and wind erosion. While these piles are currently not regulated emissions units, they were observed to be producing visible fugitive emissions at levels sufficient to be in violation of the applicable standards, had they been identified as such. Specifically, US EPA Method 22 observations were conducted on a mobile magnetic crane moving material from a pile on the ground into a storage pile. The accumulated visible emissions time of four minutes and ten seconds was recorded over a seven minute observation period. Given the fugitive visible emissions produced by the piles and from the handling of the material, at this time Ohio EPA requests that OmniSource submit emissions calculations quantifying emissions from the facility storage piles and from facility-wide material handling operations.
6. On June 23, 2011, I visited the facility to review records for the previous 30 days for the watering of plant roadways and parking areas. The records were found to be in compliance with the applicable permits.

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Please submit a written response to this letter by August 12, 2011. The response must include a compliance plan to remedy the violations and prevent them, or any similar such violation, from occurring in the future as well as the calculations identified in Item #5 above. The response should also contain an explanation of why the previously agreed plans to resolve the dust problems at the facility have failed. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA is currently in enforcement negotiations with the company to resolve previous violations of this nature.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3137 or via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

//lr

pc: c Thomas C. Cikotte, DAPC-NWDO File
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