



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: Richland County
MultiServ
1490 Old Bowman Street
Mansfield, OH 44903
Premise # 0370010148
Notice of Violation

CERTIFIED MAIL

7006 0100 0004 1318 4405

May 8, 2007

Mr. Glenn D. Hundertmark
Manager, Environmental Control
MultiServ
8050 Rowan Road, Suite 600
P.O. Box 5003
Cranberry Township, PA 16066

Dear Mr. Hundertmark:

This letter shall serve as follow-up to the inspections conducted at the above-referenced facility on April 30, 2008, by Mr. Mohammad Smidi and myself and on May 6, 2008, by Mr. Brian Riedmaier and myself, from the Northwest District Office (NWDO). The observations were conducted as part of an ongoing investigation regarding complaints and concerns stemming from nuisance dust along Old Bowman Street Rd., in Mansfield, Ohio.

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

1. Upon our arrival at the facility on April 30, 2008, a large plume of visible emissions could be seen from the roadway. NWDO entered the facility and approached the slag screening operations. Visible emissions were observed to be far in excess of the permitted limits of 10% opacity at the grizzly feeder, all points of the screening operations, all material transfer points and several storage pile loading points. Visible emissions ranged from 30-60% opacity at the above noted points. NWDO was preparing to conduct USEPA Method 9 observations when the operations were shut down. At the levels first observed, visible emissions violations would have been documented had we been able to conduct these Method 9 observations.

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Past correspondence and Ohio Permit to Install (PTI) 03-13951 indicate that reduced drop heights at loading and unloading points, wet suppression at crushing and transfer points and a water mist system at screening and primary feeder points should all have been employed to minimize visible emissions of fugitive dust. Observation on April 30, 2008, showed none of these control measures were being employed and that emissions were not adequately controlled. This is a violation of Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) for failure to meet the best available technology requirements established in Special Terms and Conditions A.2.b and A.2.c of PTI 03-13951 and Ohio Revised Code 3704.05.

2. For emissions units F001, plant roadways and parking areas, term 4 of the Special Terms and Conditions section of the Ohio Permit to Operate (PTO), issued 7/28/95, states that all open bodied vehicles used in the transporting of materials likely to become airborne shall be covered at all times. On November 18, 2004, Ohio EPA issued MultiServ a notice of violation (NOV) for violation of this term and condition. On March 14, 2006, a warning letter was sent to MultiServ for complaints and suspected violation of this term and condition. At this time NWDO also expressed that the material brought from MultiServ was considered likely to become airborne and all trucks leaving the property were required to be covered. On May 6, 2008, a vehicle was observed exiting MultiServ and was followed from the plant to US Route 30 west. Visible emissions were observed coming from the bed of the vehicle along Bowman St. and US Route 30 west. This is a violation of term 4 of the Special Terms and Conditions section of the Ohio PTO.
3. On April 30, 2008, facility roadways were not being watered adequately. Upon arrival, the majority of plant roadways were dry, except for those near the sprinklers which apply water to cooling slag piles. At the plant entrance, installed water sprinklers were not operating. The water truck used to apply water to the roadways was parked and empty. Upon our exit, the entrance sprinklers were operating however they had not reached proper pressure and were not oscillating, as though they had just recently been turned on.

On May 6, 2008, the plant entrance sprinklers were being properly employed and the entrance was watered. The unpaved plant roadways beyond the scales were not watered and do not have sprinklers. Roads near the cooling slag piles were not observed.

On both dates, USEPA Method 22 visible emissions observations were not conducted. However, given wind conditions on both days, it is believed that conditions existed which could have justify the complaints we are receiving. NWDO is making note of the conditions and believes the facility's control measures are inadequate.

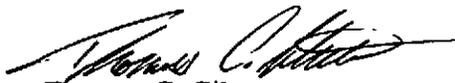
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4. During the May 6, 2008 visit, Mr. John Hill, of MultiServ, indicated that emissions unit F003, slag processing operations, no longer contained crushing operations and had not for at least three to four years. Ohio EPA is requesting an updated process flow diagram for emissions unit F003.

A written response should be submitted to Ohio EPA by June 9, 2008. It should include all requested information as well as a compliance plan to remedy the observed situations and prevent this, or any similar such situation, from occurring in the future. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the 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.

If you have any questions or concerns regarding this letter, please contact me at (419) 373-3137 or electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Environmental Specialist II

/csl

cc: Lisa Holscher, US EPA Region 5
Tom Kalman, CO,DAPC
Don Waltermeyer, NWDO, DAPC
<Mohammad Smidi, NWDO, DAPC>
Thomas C. Cikotte - NWDO, DAPC