



Environmental
Protection Agency

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

Re: Richland County
Stein Steel Mill Services, Inc.
Premise # 03.70.01.0148
Notice of Violation (NOV)

February 23, 2011

CERTIFIED MAIL

Mr. James Conlon
Stein Steel Mill Services, Inc.
1929 East Royalton Rd.
Broadview Heights, Ohio 44147

Dear Mr. Conlon:

This letter shall serve as follow-up to the inspection conducted on February 16, 2011, of the facility operated by Stein Steel Mill Services, Inc. (Stein) at 1490 Old Bowman St. in Mansfield, Ohio by Mr. Chad Winebrenner and myself. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. Stein acquired the facility from Heckett-MultiServ and officially began operation at the above referenced site on July 13, 2010. Stein had requested that any permits applicable to Heckett-MultiServ be transferred to Stein so that operation could continue. At that time, and in subsequent correspondence, Stein indicated that several emissions units remained on site. Ohio EPA indicated in an e-mail, dated September 8, 2010 that any emissions units that were new to the site would need to be properly permitted and Stein was asked to identify any new units. No new units were identified at that time.
2. On January 31, 2011, Stein submitted an annual Permit Evaluation Report (PER) indicating an emissions unit which was not supposed to be on site (F006) was in compliance with permit terms and conditions. Also, multiple emissions units which should have been included in that report were absent (F001 & F002). This prompted Ohio EPA to conduct a compliance investigation to accurately determine which emissions units were on site and their compliance status.
3. Initial conversations with facility staff on February 16, 2011, indicated that all equipment on site during operation by Heckett-MultiServ was removed and all the equipment on site was brought on site by Stein. It was also determined that the facility roadways, storage piles locations and storage pile contents had been significantly changed from the specifications identified in the installation permit applications originally submitted by Heckett-MultiServ.

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Therefore, none of the facility roadways, facility storage piles or the equipment on site was subject to transfer of ownership. Subsequently, all of these emissions units are considered new installations and will now require Ohio Permits-to-install/operate (PTIOs)

4. Stein installed and operated the following emissions units without first obtaining a PTIO: main aggregate processing plant (Main Plant - with feeder and conveyor, Company ID# 1740); secondary aggregate processing plant (Materscreen "Senator", Company ID# 1134); facility roadways; facility storage piles. Failure to obtain a PTIO prior to installation and/or operation of each of the above identified emissions units is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A) and Ohio Revised Code (ORC) 3704.05. To remedy this situation the company must submit a complete PTIO application to this office for the unit in question no later than March 28, 2011.

The company's written response to this letter is requested by March 30, 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. The response must also include complete PTIO applications, including all required forms, process flow diagrams and emissions calculations, for the emissions units identified above.

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.

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

/llr

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ec: William MacDowell, U.S. EPA Region V
Tom Kalman, DAPC - CO
Jennifer Jolliff, DAPC - NWDO
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