



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

July 20, 2009

Re: Washington County
Skyline Steel
Facility ID # 0684010138
Notice of Violation
Non-HPV
Certified #70063450000190558157

Dennis Bates
Skyline Steel, LLC
12355 State Route 7
Belpre, OH 45174

Dear Mr. Bates:

On April 27, 2009, I received an electronic copy of Skyline Steel, LLC's 1st Quarter 2009 deviation report. Skyline Steel indicated the following violations in the report:

- Coating usage in January, February and March 2009 exceeded the 8,760 gallons per rolling, 12-month total allowed by the permit;
- Clean-up material usage in January, February and March 2009 exceeded the 720 gallons per rolling, 12-month total allowed by the permit;
- VOC emissions in February and March 2009 exceeded the 19.5 tons per rolling, 12-month total allowed by the permit;
- Xylene emissions in March 2009 exceeded the individual HAP 9.2-tons per 12-month total allowed by the permit; and
- The daily volume-weighted average calculations were not performed.

The facility indicated in a letter dated June 12, 2009 that violations of the emissions limitations were due to unexpected increase in business. In the same letter, the facility listed the following corrective actions to address the violations:

- The daily volume-weighted averages will be calculated;
- The current Permit-to-Install and Operate (PTIO) modification application that is pending at OEPA, DAPC, SEDO will be withdrawn;
- A Permit to Install (PTI) application will be submitted to increase emissions; and

- A Title V permit application will be submitted.

The June 12, 2009 letter from Skyline stated the actual rolling, 12-month emissions as of March, 2009 are 9.26 tons of Xylene (HAP) and 21.16 tons of VOC. Please be aware that the facility is approaching the 10 tons per year threshold that would require the facility to receive a Title V permit. Please note that if the facility becomes a major source the facility has one year to submit a Title V operating application to our agency per Ohio Administrative Code (OAC) rule 3745-77-04(D).

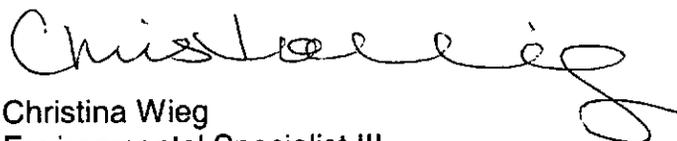
In addition, please be aware that you have exceeded your allowable emissions limitations for VOC and HAPs as defined in PTI 06-08306. The facility indicated in its last correspondence with the agency (dated June 12, 2009) that it would be submitting a request for a modification of PTI 06-08306. No modification application has been received or processed to-date. Therefore, the facility is currently in violation of OAC 3745-31-02(A)(1)(a).

Within 14 days of receipt of this letter, Skyline Steel shall submit a plan and schedule to return the facility to compliance. The plan should include a timeline for completing corrective actions and the corrective actions taken, such as the submittal of an OAC Chapter 3145-31 modification application to PTI 06-08306.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5223.

Sincerely,



Christina Wieg
Environmental Specialist III
Division of Air Pollution Control
Ohio EPA, Southeast District Office

CW/mlm

cc: Michael Cherfen, Skyline Steel
Tim Carpenter, Skyline Steel
Kimberly A. Ness, August Mack
Bruce Weinberg, DAPC/SEDO



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

August 3, 2009

Re: Washington County
Skyline Steel, LLC
Facility ID # 0684010138
Compliance Plan
Certified #70063450000190558263

Dennis Bates
Skyline Steel, LLC
12355 State Route 7
Belpre, OH 45174

Subject: Acceptance of Skyline Steel LLC's Plan and Schedule to Return to Compliance

Dear Mr. Bates:

On July 20, 2009, the Ohio EPA, Southeast District Office, Division of Air Pollution Control (SEDO, DAPC) issued a Notice of Violation to address the deviations/violations documented in Skyline Steel, LLC's 1st Quarter 2009 deviation report. As a result of the deviations/violations documented in the report, Ohio EPA requested a plan and schedule to address the deviations/violations. On July 24, 2009, our office received the requested plan and schedule from Skyline Steel, LLC.

The submitted compliance plan included the following steps that have been or will be carried out by the facility:

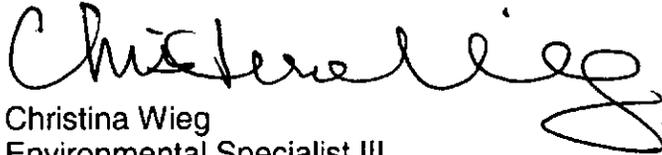
- the daily volume-weighted averages are being calculated and will be submitted to our office as soon as they are completed;
- the current Permit-to-Install and Operate (PTIO) modification application has been withdrawn from the Ohio EPA, DAPC permitting system;
- a Permit-to-Install (PTI) application will be submitted **by August 5, 2009** to increase the allowable emission limitations for emissions unit K001; and
- a Title V permit application will be submitted **within one year of the facility becoming a major source.**

The Ohio EPA accepts Skyline's plan and schedule as submitted. Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.6 of the Ohio Revised Code. The determination to pursue or to decline such penalties in this case will be made at a later date.

Dennis Bates
Skyline Steel, LLC
August 3, 2009
Page 2

If you have any questions, feel free to contact me at (740) 380-5223 or email christina.wieg@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink that reads "Christina Wieg". The signature is written in a cursive style with a large, looping "g" at the end.

Christina Wieg
Environmental Specialist III
Division of Air Pollution Control

CW/mlm

cc: Michael Cherfen, Skyline Steel
Tim Carpenter, Skyline Steel
Kimberly A. Ness, August Mack
Bruce Weinberg, DAPC/SEDO