



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

February 5, 2009

Re: Washington County
Skyline Steel
Facility ID # 0684010138
Notice of Violation
Non-HPV
Certified #70073020000178821213

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

Dear Mr. Bates:

On December 1, 2008, I performed an inspection of Skyline Steel, LLC located in Belpre, Ohio. This inspection was conducted in order to determine the facility's compliance with state and federal air pollution rules and regulations.

During the visit, I discussed with you the Ohio Environmental Protection Agency (Ohio EPA) Division of Air Pollution Control's permit requirements for Skyline Steel. I observed the following issues or violations:

- I discussed with you photos taken on November 6, 2008 by Ohio EPA employee Michael Carper which showed visible emissions (VEs) escaping from one of the building vents at the facility. You indicated to me that the VEs observed in the photo were not from the coating line operations, but from the manufacturing side of the facility. The VEs in the photos appear to be associated with the plasma cutter line where the steel coils are cut. It was explained by facility representatives that a hood, duct work, exhaust fan, and fabric filter were installed on the plasma cutter to exhaust emissions outside of the building. At this time, I am requesting that you conduct a review of the permitting needs for the plasma cutter at the facility to determine if a permit-to-install and operate (PTIO) is needed per Ohio Administrative Code (OAC) rule 3745-31-02. **Please provide a written response to the agency including the emissions calculations which were used as the basis for the decision.**
- During the site visit, I viewed the record keeping required by permit-to-install (PTI) 06-08306. The records provided by you were found to be incomplete and were not filled in since October 2008, and were therefore, in violation of permit term C.3. On December 30, 2008, you provided to the agency an electronic copy of the updated and completed records for calendar year 2008. **Please provide a written response to the agency indicating what steps the facility has taken to prevent such violations from occurring in the future.**

- During the site visit, I determined that the facility had exceeded the rolling 12-month summation of coating and clean-up material use limitation specified in PTI 06-08306. Therefore, the facility is in violation of permit term B.2. During the site visit, you indicated that you were aware of the exceedance and had contacted a consultant for assistance in requesting a permit modification to increase the allowable for the coating lines. The agency acknowledges that a PTIO modification for K001 was received on December 3, 2008, and is pending review and processing at this time.
- It was determined during the site visit and by reviewing Ohio EPA files that the company has not submitted the required deviation reports and is therefore in violation of permit term D.3. **Please submit deviation reports for 1st quarter 2008 (covering January-March 2008), 2nd quarter (covering April-June 2008), and 3rd quarter 2008 (covering July-September 2008). In addition, the submitted 4th quarter 2008 deviation report indicated no deviations from the PTI 06-08306. Please review this letter and the facility's records and resubmit the 4th quarter 2008 deviation report outlining all deviation from any permit term or condition in PTI 06-08306 for the period between October 2008 through December 2008.**

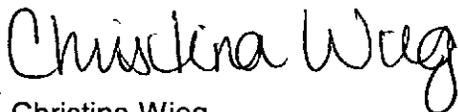
Within 30 days of receipt of this letter, please submit a plan and schedule to return the facility to compliance. Please include in the response the requested bolded information above. The plan should include a timeline for completing corrective actions and the corrective actions taken.

Acceptance by Ohio EPA of a schedule for compliance does not constitute a waiver of 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 Ohio EPA at a later date.

I urge the facility to carefully review the facility's current Ohio EPA Division of Air Pollution Control Permits. The facility should become familiar with the numerous emissions limitations, operational restrictions, monitoring and record keeping requirements, reporting requirements, and testing requirements.

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

CW/mlm

cc: Michael Cherfen, Skyline Steel
Tim Carpenter, Skyline Steel
Bruce Weinberg, DAPC/SEDO