



Environmental
Protection Agency

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

CERTIFIED MAIL # 91 7108 2133 3932 4449 0885

July 29, 2011

Thomas Whitten
ArcelorMittal Columbus LLC
1800 Watkins Road
Columbus, OH 43207-3440

Re: **Notice of Violation** for exceedance of the opacity limitation for annealing furnace (P005) at ArcelorMittal Columbus, LLC (Facility ID 0125041935)

Dear Mr. Whitten:

On Wednesday, July 20, 2011, you and Rich Zavoda (ArcelorMittal USA), contacted Barbara Walker of my staff regarding the operational status of the annealing furnace (Ohio EPA Emission Unit ID P005).

During the conversation, you mentioned that the furnace was restarted after scheduled maintenance during the evening hours of Tuesday, July 19, 2011, and that once P005 reached normal operating temperature on the morning of July 20, 2011, product began being run through the furnace.

In addition, you mentioned that there was "some opacity" with a definite edge to the plume coming from P005's stack, and that the plume could exist for periods of time over the next one and a half weeks as the furnace burners were being "re-tuned."

Finding

A certified visible emission reader was dispatched to ArcelorMittal Columbus on the afternoon of July 20, 2011, and the morning of July 27, 2011. CDO personnel performed U.S. EPA Method 9 to visually determine the opacity of emissions from P005's exhaust stack. During the observation period on July 20, opacity from the stack ranged from 25 percent to 45 percent. During the observation period on July 27, opacity from the stack ranged from zero percent to 55 percent. There were several violations of the visible opacity standard on both days, the highest six minute average being 49 percent on July 27, 2011.

Violation

Visible opacity of emissions greater than 20 percent as a six-minute average is considered a violation of the terms and conditions of Federally Enforceable State Permit To Operate (FESOP) P0083071 and Ohio Administrative Code (OAC) 3745-17-07(A).

Violation of FESOP P0083071 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

"[no] person who is the holder of a permit ... shall violate any of its terms and conditions."

Violation of OAC rule 3745-17-07(A) is also considered a violation of ORC 3704.05(A) which states:

"No person shall cause, permit, or allow emission of an air contaminant in violation of any rule adopted by the director of environmental protection..."

Requested Action

Ohio EPA Central District Office (CDO) has been informed that the annealing furnace will be tuned to optimal performance through the week of July 25, 2011. Ohio EPA requests the following information:

- Any and all burner adjustments and changes performed over the last two months. For example, stoichiometric adjustments to the air/fuel ratio for each burner;
- An assessment of NOx emissions, provided by the air/fuel ratio and NOx emission log, under current (untuned) conditions and upon P005 returning to compliance; and
- A notification when the tuning has been completed and ArcelorMittal Columbus believes the emissions unit has returned to compliance.

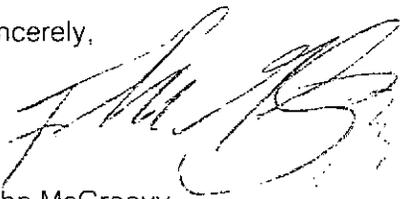
Additional Information

Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by the Ohio EPA at a later date.

Thomas Whitten
ArcelorMittal Columbus LLC
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If you have any questions, please contact Barbara Walker of my staff at (614) 728-3805 or barbara.walker@epa.state.oh.us.

Sincerely,



8/11/2011

John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Rich Zavoda, ArcelorMittal USA
Adam Ward, Manager, DAPC/CDO
Kelly Toth, DAPC/CDO
Barbara Walker, DAPC/CDO
John Paulian, DAPC/CO

e: John McGreevy, CDO/DAPC

Enclosure