



Environmental
Protection Agency

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

March 29, 2011

Franklin County
ArcelorMittal Columbus LLC
Ohio ID Number 0125041935
Air Compliance Evaluation

Thomas Whitten
Engineer - Environmental, Health & Safety
ArcelorMittal Columbus LLC
1800 Watkins Road
Columbus, OH 43207-3440

Re: Notice of Violation based upon the March 8, 2011, ArcelorMittal Columbus LLC full air compliance evaluation

Dear Mr. Whitten:

Ohio EPA Central District Office (CDO) inspectors, Sara Geary and I, conducted a full compliance inspection of ArcelorMittal Columbus LLC on March 8, 2011. The purpose of the inspection was to evaluate compliance with the terms and conditions of the applicable Federally Enforceable State Permit to Operate (FESOP) along with all other applicable permits.

Listed below are "Findings" based upon CDO observations and conversations with facility personnel. The findings are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

1. **Finding: Unpermitted operation of air contaminant sources**

CDO personnel observed a 19.9 mmBtu/hour natural gas/distillate fuel fired boiler, identified by Ohio EPA as B003, in operation. Permit-to-install (PTI) 01-2223 was issued for B003 in July 1989. Permit-to-operate (PTO) P0005440 was issued for B003 on May 31, 1991, and expired on May 31, 1994. No renewal permit application was submitted to Ohio EPA and no renewal permit to operate was issued for this unit.

Violation:

The installation and operation of an air contaminant source without first obtaining a permit-to-install and operate (PTIO) is considered a violation of Ohio Administrative Code (OAC) 3745-31-02(A) which states:

"No person shall cause, permit, or allow the... installation, or modification and subsequent operation of any new source ... without first obtaining a PTIO from the director."

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Violations of OAC 3745-31-02 are 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 or conditions."

Requested Action:

CDO requests that ArcelorMittal Columbus LLC submit a complete renewal PTIO or permit-by-rule (PBR) application for emission unit B003 within thirty (30) days of receipt of this letter.

2. **Finding: Failure to perform monitoring and recordkeeping**

During the facility compliance evaluation on March 8, 2011, CDO personnel requested to review all monitoring records being maintained by ArcelorMittal Columbus LLC. CDO personnel were presented with partial records for the roll coater (Ohio EPA ID K003) and the required records for the annealing furnace (Ohio EPA ID P005).

CDO personnel were informed that records for the 24.2 mmBtu/hr boiler (B005) would be estimates and not based on the boiler's actual hours of operation. In addition, CDO personnel were informed that records for the emergency generator (B007) were not available. Also, the information gathered for B007 after the inspection would not include a monthly summation of operating hours as required by PBR06358.

Violation:

Operation of emission unit K003 without maintaining records of the coating usage is considered a violation of the terms and conditions of permit-to-operate (PTO) P0083071 section of the emission unit which states:

"The permittee shall collect and record the following information each month for this emissions unit:

...c. the number of gallons of each coating employed."

Operation of B005 without performing the required recordkeeping of the natural gas usage is considered a violation of the terms and conditions of permit-to-install and operate (PTIO) P0083073 section of the emission unit which states:

"The permittee shall maintain monthly records of the total volume of natural gas (mmft³) burned in this emissions unit. Also, the permittee shall record the cumulative production rate for each calendar month."

The operation of emission unit B007 without performing the required recordkeeping is considered a violation of the permit terms and conditions from PBR06358 which state:

"Emergency electrical generators ... powered by internal combustion engines greater than 50 horsepower (37.3 Kilowatts) where each engine operates at any one facility for no more than five hundred hours per rolling, twelve-month period and where such an engine burns gasoline, natural gas, distillate oil (with less than or equal to 0.5 per cent by weight sulfur) ... that maintains the following records:

- (i) Monthly records that contain the rolling twelve-month hours of operation; and*
- (ii) Records that show the type of fuel used and the sulfur content (in per cent by weight)."*

Violation of the permit terms and conditions of PTO P0083071, PTIO P0083073 and PBR06358 are 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 or conditions."

Requested Action:

CDO requests that ArcelorMittal Columbus LLC. immediately comply with all monitoring and record keeping requirements in accordance with the terms and conditions in PTO P0083071, PTIO P0083073 and PBR06358.

3. **Finding: Failure to install required monitoring equipment**

During the facility visit on March 8, 2011, CDO personnel were informed that continuous temperature monitors were installed directly behind the volatile organic compound (VOC) fans. Permit-to-operate (PTO) P0083071 requires the continuous temperature monitors to be installed at the inlet of the selective catalyst reduction (SCR) control device.

Violation:

The operation of the SCR without the required continuous temperature monitor located at the inlet to the SCR control device is considered a violation of the terms and conditions of permit-to-operate (PTO) P0083071 "Monitoring and/or Record Keeping Requirements" which states:

"The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the inlet duct temperature of the selective catalyst reduction control device when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter."

Violation of the permit terms and conditions of PTO 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 or conditions."

Requested Action:

CDO requests a compliance plan and schedule from ArcelorMittal Columbus LLC within thirty (30) days of receipt of this letter. This plan and schedule should include information on the testing and installation of the monitor to ensure that SCR inlet temperature is being measured accurately and demonstrate the emissions unit is in compliance with permitted emissions limitations for oxides of nitrogen (NOx) and carbon monoxide (CO).

Also, CDO requests that ArcelorMittal provide copies of manufacturer instructions and recommendations for operations and maintenance of the control device, including detailed schematics of the control device, associated ductwork, and current and proposed thermocouple locations. Please provide this information within thirty (30) days of receipt of this letter.

In addition, CDO requests that ArcelorMittal provide any and all information that may demonstrate that P005 is currently operating in compliance with permitted emission limitations within fourteen (14) days of receipt of this letter. The information submitted should include NOx and ammonia feed monitoring records maintained by the facility and a copy of the 2008 emission test performed after the last SCR catalyst replacement.

Summary of Requested Actions:

CDO requests the following actions be performed:

1. Submit a complete PTIO or PBR application for B003 within thirty (30) days;
2. Immediately perform and maintain all required record keeping;
3. Submit a plan and schedule detailing the installation of the required SCR control device inlet temperature continuous monitor(s) and recorder within thirty (30) days;
4. Submit a copy of the control device operation and maintenance information from the manufacturer within thirty (30) days;
5. Submit detailed schematics of the control device within thirty (30) days;
6. Submit P005 monitoring records and a copy of the 2008 emission test performed on P005 within fourteen (14) days.

Thomas Whitten
ArcelorMittal Columbus LLC
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Additional Information:

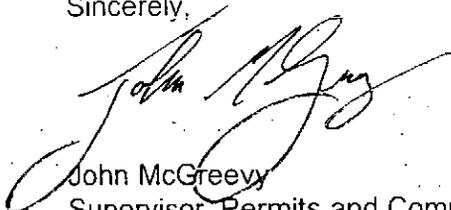
ArcelorMittal Columbus LLC is a Synthetic Minor Title V (SMTV) facility. All SMTV facilities are required to submit certain reports via the eBusiness Center: Air Services, which is accessed through the eBusiness Center. The eBusiness Center may be reached from Ohio EPA home page at www.epa.state.oh.us or directly at ebiz.epa.ohio.gov.

If at some time in the future this facility plans to install additional air contaminant sources or modify an existing air contaminant source, please contact Ohio EPA, Central District Office to obtain the appropriate forms and discuss the applicability of any rules in question. Ohio EPA endeavors to process all applications in an expeditious manner.

Please note that 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 Ohio EPA at a later date.

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

Sincerely,



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

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

e: John McGreevy, DAPC/CDO

Enclosure