



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL # 91 7108 2133 3932 4449 7563**

August 25, 2009

Mr. Joseph A. Cuske  
Amsted Rail - Columbus Plant  
3900 Bixby Road  
Columbus, OH 43125

**Re: Notice of Violation, Facility ID 0125100987, Excess EAF Visible Fugitive Particulate Emissions**

Dear Mr. Cuske:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), received and responded to a complaint on August 10, 2009, regarding excessive visible particulate emission released from the roof monitor area above the electric arc furnaces (EAFs P901, P902) at the Amsted Rail facility on Bixby Road. Below is a summary of the findings and corresponding action items.

**Finding 1: August 12, 2009 Excess Fugitive Emissions Observations**

CDO staff investigated the complaint on August 12, 2009, by observing opacity above the roof monitor from an adjacent roadway between 11:47 am and 12:48 pm (see attached Method 9 forms). The observations indicated opacity readings well in excess of the 20% limitation found in Amsted Rail's permit-to-install and Title V operating permit, including some average readings above 60% opacity. CDO staff notified Kim Myers, Amsted Rail, regarding the excessive opacity shortly after the opacity readings were completed. Kim Myers responded that he would initiate an investigation as soon as practical and would be inspecting the duct work for blockage.

Kim Myers notified CDO staff by phone on August 14, 2009, that maintenance staff investigated the operation of the hooding and duct work from the EAFs following shutdown on August 12, 2009. The staff attributed the poor capture efficiency to dampers within the duct work that did not open to 90%, as programmed but were only opening to 50%. The dampers were repaired on August 12, 2009, and he indicated that during production on August 13, 2009, he observed the roof monitor for visible particulate emissions. His observations indicated that the EAFs were operating in compliance with the permit allowable opacity limit.

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



**Finding 2: August 17, 2009 Excess Fugitive Emissions Observations**

On August 17, 2009, between 11:51 a.m. and 12:00 p.m., CDO staff again observed visible emissions at the roof monitors and recorded readings that averaged 26% opacity during a 60-minute observation (see attached Method 9 form). These readings exceeded the limitation of 20% opacity, as a six-minute average found in the PTI and Title V permits.

**Violation:**

Ohio EPA DAPC issued modification air permit-to-install (PTI) 01-12147 on September 8, 2008 that limits the visible fugitive particulate emissions from the roof monitor above the two EAFs (P901, P902) to not exceed 20 percent opacity, as a 6-minute average, during any 1 hour observation period. An identical requirement is also found in the facility's Title V permit issued on March 26, 2004.

Operating an emissions unit in violation of the opacity limitations in an effective PTI and Title V operating permit is a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

**Action for Remedy**

Please submit the following compliance plan and schedule with milestone dates on which each will be achieved within thirty (30) days of receipt of this letter:

<u>Milestone</u>	<u>Completion Date</u>
1. Propose a corrective action to return to compliance and meet the fugitive visible emission limitation for the electric arc furnaces:	_____
2. If applicable, submit a written malfunction report per Ohio Administrative Code (OAC) rule 3745-15-06(B) if the duration of the incident was Greater than 72 hours	_____

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Mr. Joseph A. Cuske  
Amsted Rail - Columbus Plant  
Page -3-

If you have any questions concerning the issues addressed in this letter, please contact John Kirwin of my staff at (614) 995-0673.

Sincerely,



Kelly Toth  
Air Permits and Compliance Supervisor  
Division of Air Pollution Control  
Central District Office

Enclosures: U.S. EPA Method 9 Forms

c: Adam Ward, Manager, DAPC/CDO

ec: John Kirwin, DAPC/CDO  
John Paulian, Ohio EPA, DAPC/CO

KT/JK/cl 090824NOVgriffinwheel

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Choose One)  
 Method 9 203A 203B Other: \_\_\_\_\_

Company Name: Amsted Rail  
 Facility Name: Griffin Wheel  
 Street Address: Buxley Rd  
 City: Gravesend State: OH Zip: 43125

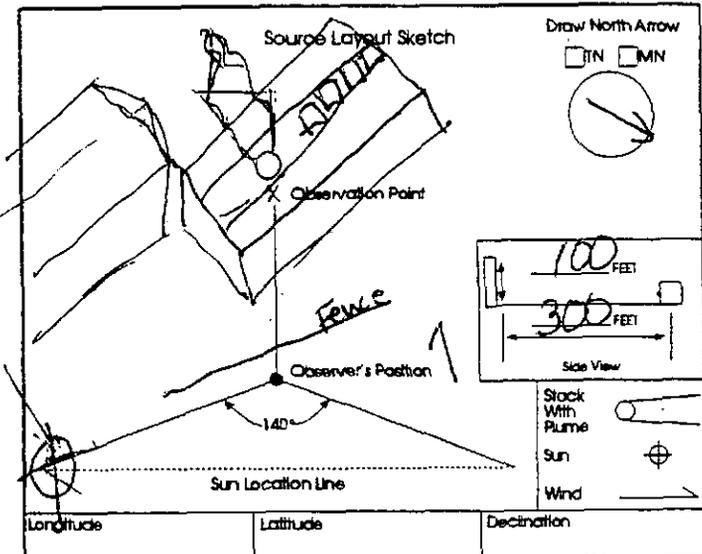
Process: EAF slag off/refin Unit #: 140/102 Operating Mode: Yes  
 Control Equipment: EAF dust collector Operating Mode: Yes

Describe Emission Point:  
Roof monitor above EAF on western section of plant  
 Height of Emiss. Pt. Start: 100 ft End: 150 ft Height of Emiss. Pt. Rel. to Observer: Start: 100 ft End: 100 ft  
 Direction to Emiss. Pt. (Degrees) Start: 320 End: 300 Start: 320 End: 320

Vertical Angle to Obs. Pt. Start: 20° End: 20° Direction to Obs. Pt. (Degrees) Start: 40° End: 40°  
 Distance and Direction to Observation Point from Emission Point: Start: 300 ft ne End: 300 ft ne

Describe Emissions:  
 Start: rust colored plume End: rust colored plume  
 Emission Color: Start: Red End: Red Water Droplet Plume: Attached  Detached  None

Describe Plume Background:  
 Start: Clear sky End: Clear sky  
 Background Color: Start: Blue End: Blue Sky Conditions: Start: PC End: PC  
 Wind Speed: Start: 0-15 End: 0-15 Wind Direction: Start: NE End: NE  
 Ambient Temp: Start: 86° End: 86° Wet Bulb Temp: \_\_\_\_\_ RH Percent: \_\_\_\_\_



Additional Information:  
 Spoke with Kim Myers regarding opacity at facility he indicated that maintenance crews were inspecting ductwork on 8/14/09 shutdown.

Form Number: \_\_\_\_\_ Page: 1 of 2  
 Continued on VEO Form Number: \_\_\_\_\_

Min	Observation Date: <u>8/14/09</u> Time Zone: <u>EDS</u> Start Time: <u>12:18:30</u> End Time: <u>12:48:45</u>				Comments
	Sec	0	15	30	
1	40	60	90	90	
2	80	80	80	70	
3	80	80	80	70	
4	90	80	0	0	
5	0	0	0	0	
6	0	0	30	50	
7	70	80	30	80	
8	80	80	80	80	
9	60	20	30	30	
10	60	60	60	40	
11	20	20	20	0	
12	30	50	50	40	
13	20	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	-	-	
18	-	20	30	40	
19	30	20	20	20	
20	20	20	40	20	
21	10	10	20	20	
22	10	10	10	10	
23	0	0	0	10	
24	0	10	20	0	
25	10	10	0	0	
26	0	30	30	40	
27	40	30	30	20	
28	10	20	20	0	
29	0	0	0	0	
30	0	0	0	0	end 12:48:45

Observer's Name (Print): John Kerwin  
 Observer's Signature: [Signature] Date: 8/12/09  
 Organization: Ohio EPA/OD  
 Certified by: [Signature] Date: 3/25/09

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9      203A      203B      Other: \_\_\_\_\_

Company Name: Armsted Ray  
 Facility Name: Griffin Wheel  
 Street Address: 3400 Boxley Rd  
 City: Graveport      State: OH      Zip: 43125

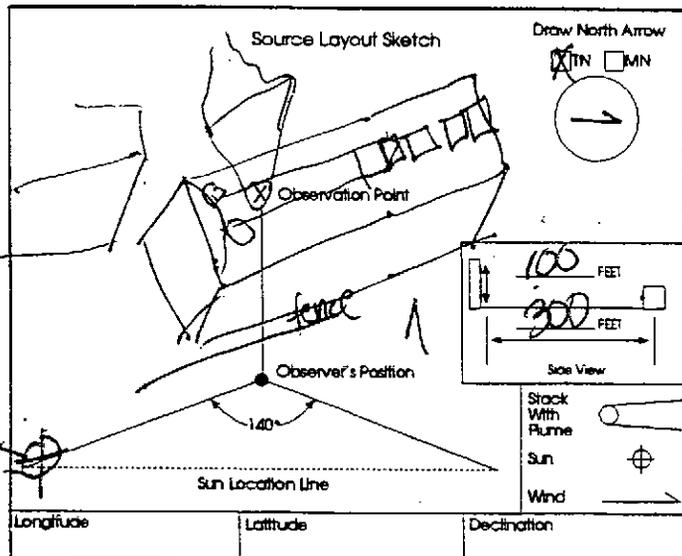
Process: Shop off/refining EAF      Unit: 1/12      Operating Mode: Yes  
 Control Equipment: EAF dust collector      Operating Mode: Yes

Describe Emission Point:  
Roof monitor above EAF on western section of plant  
 Height of Emiss. Pt. Start: 100ft End: 100ft      Height of Emiss. Pt. Rel. to Observer Start: 100ft End: 100ft  
 Distance to Emiss. Pt. Start: 300ft End: 300ft      Direction to Emiss. Pt. Start: 320° End: 320°

Vertical Angle to Obs. Pt. Start: 80° End: 20°      Direction to Obs. Pt. (Degrees) Start: 40° End: 40°  
 Distance and Direction to Observation Point from Emission Point Start: 300ft ne End: 300ft ne

Describe Emissions:  
 Start: rust colored plume End: rust colored plume  
 Emission Color: red      Water Droplet Plume:  Attached  Detached  None

Describe Plume Background:  
 Start: White clouds End: White clouds  
 Background Color: White      Sky Conditions: PC clouds  
 Wind Speed: Start: 0-5 End: 0-10      Wind Direction: Start: NE End: NE  
 Ambient Temp: Start: 85      Wet Bulb Temp.      RH Percent



Longitude: \_\_\_\_\_ Latitude: \_\_\_\_\_ Declination: \_\_\_\_\_  
 Additional Information: \_\_\_\_\_

Form Number: \_\_\_\_\_ Page: 2 of 2  
 Continued on VEO Form Number: \_\_\_\_\_

Observation Date		Time Zone		Start Time	End Time	Comments
Sec	0	15	30	45		
8/12/09	EDST	11:47	12:18			
Mtn	0	15	30	45		
1	30	60	60	60		
2	60	60	80	90		
3	80	80	60	60		
4	60	80	90	80		
5	40	60	60	40		
6	40	60	90	80		
7	50	90	80	90		
8	80	80	80	70		
9	80	70	80	70		
10	70	60	40	40		
11	50	30	40	60		
12	30	30	30	30		
13	50	30	30	30		
14	20	20	20	20		
15	20	20	20	20		
16	20	0	20	30		
17	30	20	20	20		
18	30	30	30	20		
19	0	0	0	0		
20	0	0	0	0		
21	0	0	0	0		
22	0	0	30	60		
23	80	60	50	50		
24	40	40	20	0		
25	20	0	20	30		
26	20	20	20	40		
27	40	0	30	30		
28	20	20	30	30		
29	0	40	50	40		
30	30	50	80	80	end 12:18	

Observer's Name (Print): J. Kirwin  
 Observer's Signature: J. Kirwin      Date: 8/12/09  
 Organization: Ohio EPA CDO  
 Certified by: EJK      Date: 3/25/09

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method Used (Circle One)  
 Method 9 203A 203B Other: \_\_\_\_\_

Company Name: Amstel Raw  
 Facility Name: Griffin Wheel  
 Street Address: 3900 Buxby Rd  
 City: Groveport State: OH Zip: 43125

Process: EAF Shut off/Refining Unit #: F901 Operating Mode: yes  
 Control Equipment: Dust Collector Operating Mode: yes

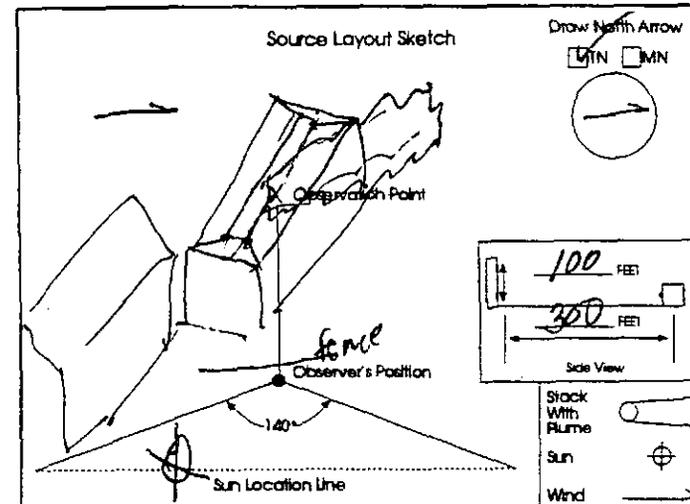
Describe Emission Point:  
Sky above roof monitor

Height of Emiss. Pt. Start 100 End 100 Height of Emiss. Pt. Rel. to Observer Start 100 End 100  
 Distance to Emiss. Pt. Start 300 End 300 Direction to Emiss. Pt. (Degrees) Start 270° End 270°

Vertical Angle to Obs. Pt. Start 10° End 10° Direction to Obs. Pt. (Degrees) Start 90° End 90°  
 Distance and Direction to Observation Point from Emission Point Start 300ft east End 300ft east

Describe Emissions  
 Start Clear End 26% mild opacity  
 Emission Color Start Clear End black Water Droplet Plume Attached  Detached  None

Describe Plume Background  
 Start blue sky End blue sky  
 Background Color Start blue End blue Sky Conditions Start PC End PC  
 Wind Speed Start 0-5 End 0-5 Wind Direction Start South End South  
 Ambient Temp. Start 84° End 84° Wet Bulb Temp. RH Percent



Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information  
Spoke with Ms. Cary Cross at 11:50 regarding opacity OAR rule 8145-11-07(B)(3)

Form Number \_\_\_\_\_ Page 1 of 2  
 Continued on VEO Form Number \_\_\_\_\_

Min	Time Zone				Start Time	End Time	Comments
	Sec	0	15	30			
					<u>11:30</u>	<u>12:00</u>	
1	0	0	0	0			
2	0	0	0	0			
3	0	0	0	0			
4	0	0	0	0			
5	0	0	0	20			
6	30	20	20	20			
7	20	20	15	10			
8	0	0	0	0			
9	0	0	0	0			
10	0	0	0	0			
11	0	0	0	0			
12	0	0	0	0			
13	0	0	0	0			
14	0	0	0	0			
15	0	0	0	0			
16	0	0	0	0			
17	0	0	0	0			
18	0	0	0	0			
19	0	0	0	0			
20	0	0	0	0			
21	10	20	20	20			
22	20	15	15	15			
23	10	10	10	25			
24	30	25	25	25			
25	20	25	25	25			
26	25	25	30	30			
27	30	30	30	20			
28	30	30	30	40			
29	20	20	20	10			
30	0	5	5	5			<u>26% opacity 12:00 stop</u>

Observer's Name (Print): John Korman  
 Observer's Signature: [Signature] Date: 8/17/09  
 Organization: Chapel Hill EPA  
 Certified by: ETA Date: 3/26/2009

EPA

VISIBLE EMISSION OBSERVATION FORM 1

Method used (Circle One)  
 Method 9 203A 203B Other \_\_\_\_\_

Company Name Amsted Rail  
 Facility Name Griffin Wheel  
 Street Address 3900 Buxby Rd  
 City Columbus State OH Zip 43218

Process EP 400 AF Unit # \_\_\_\_\_ Operating Mode yes  
 Control Equipment Dust collector Operating Mode yes

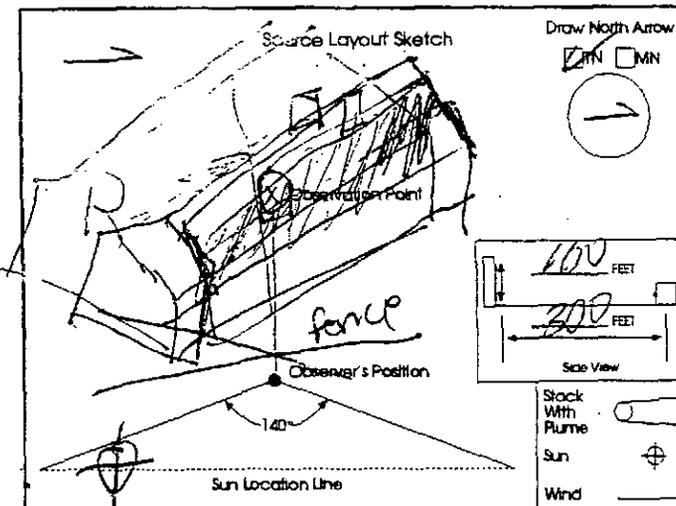
Describe Emission Point  
Sky above roof monitor

Height of Emiss. Pt. Start 100ft End 100ft Height of Emiss. Pt. Rel. to Observer Start 100ft End 100ft  
 Distance to Emiss. Pt. Start 300ft End 300ft Direction to Emiss. Pt. (Degrees) Start 270° End 270°

Vertical Angle to Obs. Pt. Start 10° End 10° Direction to Obs. Pt. (Degrees) Start 90° End 90°  
 Distance and Direction to Observation Point from Emission Point Start 300ft east End 300ft east

Describe Emissions  
 Start Clear End Clear  
 Emission Color Start Clear End black Water Droplet Plume Attached  Detached  None

Describe Plume Background  
 Start blue sky End wh to cloud  
 Background Color Start blue End blue Sky Conditions Start PC End PC  
 Wind Speed Start 0-5 End 0-5 Wind Direction Start South End South  
 Ambient Temp Start 84° End 84° Wet Bulb Temp \_\_\_\_\_ RH Percent \_\_\_\_\_



Longitude \_\_\_\_\_ Latitude \_\_\_\_\_ Declination \_\_\_\_\_

Additional Information  
See previous page

Form Number \_\_\_\_\_ Page 2 of 2  
 Continued on VEO Form Number \_\_\_\_\_

Min	Observation Date				Time Zone	Start Time	End Time	Comments
	Sec	0	15	30				
	8/17/09				EDST	12:00	12:31	
1	0	0	0	0				
2	0	0	0	0				
3	0	0	0	0				
4	0	0	0	0				
5	0	0	0	0				
6	0	0	0	0				
7	0	0	0	0				
8	0	0	0	0				
9	0	0	0	0				picture 12:04:5
10	30	30	30	10				
11	0	0	0	0				picture 12:12:45
12	0	0	0	0				
13	0	0	0	0				
14	0	0	0	15				
15	0	0	0	0				
16	0	0	0	0				
17	0	0	0	0				
18	0	0	0	0				
19	0	0	0	0				
20	0	0	0	0				
21	0	0	0	0				
22	0	0	0	0				
23	0	0	0	0				
24	0	0	0	0				
25	0	0	0	0				
26	0	0	0	0				
27	0	0	0	0				
28	0	0	0	0				
29	0	0	0	0				
30	0	0	0	0				end 12:31

Observer's Name (Print) J Kirwin  
 Observer's Signature [Signature] Date 8/17/09  
 Organization OH EPA CDX  
 Certified by EJA Date 3/26/2009