



State of Ohio Environmental Protection Agency

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July 13, 2007

Mr. Steve Heimberger
Suburban Steel
1900 Deffenbaugh Street
Gahanna, OH 43230

**Re: Facility Inspection conducted on June 14, 2007, at Suburban Steel
Facility ID # 01-25-07-3054, Notice of Violation: ORC 3704.05(c)**

Dear Mr. Heimberger:

The Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates Suburban Steel's cooperation extended during the June 14, 2007 compliance evaluation of your facility located at 1900 Deffenbaugh Street, in Gahanna, Ohio. The purpose of the inspection was to evaluate compliance with applicable state and federal air regulations.

Present during the inspection were Steve Heimberger of Suburban Steel, Luke Mountjoy and Natalie Jailil, of Ohio EPA, Division of Air Pollution Control.

The inspection consisted of the following:

- a) an examination of each emissions unit at the facility including roadways and parking, and two coating operations (F001, K001, K002),
- b) a walkthrough of the entire facility,
- c) an examination of monitoring and record keeping files maintained at the facility and,
- d) a review of reporting and fee emission files maintained at CDO.

Below is a summary of the inspection findings and action items that need to be addressed.

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

F001- Paved and Unpaved Roadways and Parking Areas

Finding - Recordkeeping of control measure implementation

A review of on-site records established that record keeping requirements were not maintained in accordance with the record keeping requirements of Suburban Steel's synthetic Minor Permit issued October 21, 2004. Specifically, Suburban Steel has not noted the exact days/dates of the week in which control measures were implemented. Section C.4.b, C.4.c, and C.4.d of the permit states the following:

"The permittee shall maintain records of the following information:

- a) the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure,*
- b) the dates the control measures were implemented; and,*
- c) on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures."*

Violation:

With respect to emission unit F001, failure to maintain records depicting date, time, implementation, and reasoning for control implementation constitute violations of the synthetic minor permit and ORC 3704.05(C). Please note, Ohio Revised Code (ORC) 3704.05(c) 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:

CDO requests that Suburban Steel immediately adhere to the record keeping requirements and maintain monthly records as required in the synthetic minor permit.

CDO also requests that Suburban Steel submit the weekly and monthly record keeping requirements for emission unit F001 for the period of June 1 through July 31, 2007, including information specified in Section C.4.a, C.4.b, C.4.c, and C.4.d of the synthetic minor permit. The requested information should be submitted within 30 days of receipt of this letter.

Mr. Steve Heimberger
Suburban Steel
Page -3-

Finding - Reporting requirements of quarterly deviations for emission unit F001

A review of on-site and Ohio EPA in-house records established that reporting requirements were not met in accordance with the reporting requirements of Suburban Steel's synthetic minor permit issued October 21, 2004. Specifically, CDO has not received any quarterly reports for the emissions units since the permit was issued. Please note, section D.1.a, D.1.b, and D.2. of the permit states the following:

"The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation and,*
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

Violation:

Failure to submit quarterly deviation reports as required by the PTI is a violation of the synthetic minor permit and ORC 3704.05(c).

Action:

CDO requests that Suburban Steel immediately adhere to the reporting requirements as required in the synthetic minor permit.

CDO also requests that Suburban Steel submit the required quarterly deviation reports for the first and second quarters of 2007. The reports should be submitted within 45 days of receipt of this letter.

K001 - Paint Shop for Miscellaneous Metal Parts

K002 - Miscellaneous Parts Coating in Yard

Finding -Daily recordkeeping requirements of coating operations

A review of on-site records established that recordkeeping requirements were not maintained in accordance with the record keeping requirements of Suburban Steel's synthetic minor permit issued October 21, 2004. Specifically, Suburban Steel has not been maintaining complete daily records of coating usage and VOC contents for K001 or K002. Sections C.1.b., C.1.c. and C.2. of the permit for K001 and K002 states the following:

"The permittee shall collect and record the following information each day for emissions unit K001/K002:

- a. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and*
- b. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,2}$.*

Violation:

With respect to emission unit K001 and K002, failure to maintain records constitute violations of the synthetic minor permit and OAC 3745-21-09(B)(3)(h). Please note that OAC rule states:

"Any owner or operator of a coating line or printing line who elects to demonstrate the ongoing status of compliance with the applicable emission limitation by means of a daily volume-weighted average VOC content shall collect and record the following information each day for the coating line or printing line and maintain the information at the facility for a period of three years:

- a. The name and identification number of each coating, as applied.*

- b. *The mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied.*
- c. *The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of rule 3745-21-10 of the Administrative Code for $C_{voc,2}$.*

Action:

CDO requests that Suburban Steel immediately adhere to the record keeping requirements and maintain daily records as required in the synthetic minor permit.

CDO also requests that Suburban Steel submit a copy of the required daily record keeping for emission units K001 and K002 for the period of June 1 through July 31 2007, including information specified in Section C.1 and C.2 of the synthetic minor permit. This information should be submitted within 45 days of receipt of this letter.

Finding- Monthly recordkeeping requirements for K001 and K002

A review of on-site records established that record keeping requirements were not maintained in accordance with the record keeping requirements of Suburban Steel's synthetic minor permit issued October 21, 2004. Specifically, Suburban Steel has not maintained monthly records of VOC and HAP contents and coating usage needed to demonstrate compliance with the synthetic minor limitations. Please note, currently none of the record keeping in section C.2. of the permit for K001 and K002 is being done:

"The permittee shall collect and record the following information each month for emission units K001 and K002 combined:

- a. *The individual VOC content for each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied,*
- b. *the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied,*
- c. *the total combined HAP content for each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c),*

- d. the number of gallons of each coating employed,
- e. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the coating usage figures,
- f. The individual VOC content for each cleanup material in pounds of VOC per gallon of cleanup material, excluding water and exempt solvents, as applied,
- g. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied,
- h. the total combined HAP content for each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from c),
- i. the number of gallons of each cleanup material employed,
- j. beginning after the first 12 calendar months of operation upon start up of either emission units K001 and K002; the cumulative rolling, 12-month summation of the cleanup materials usage figure,^(f)
- k. the summation of VOC emissions, in tons (the sum of b times f for each coating and the sum of i times m for each cleanup material),
- l. the total VOC emissions from all coating and cleanup material in tons per rolling 12-month period (the sum of b times g for each coating and the sum of i times n for each cleanup material),
- m. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of c times g for each coating and the sum of i times n for each cleanup material); and,
- n. The total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d times g for each coating plus the sum of k times n for each cleanup material).

Violation:

With respect to emission units K001 and K002, failure to maintain records constitutes violations of the synthetic minor permit and ORC 3704.05(C).

Action:

CDO requests that Suburban Steel immediately adhere to the record keeping requirements and maintain monthly records as required in the synthetic minor permit.

CDO also requests that Suburban Steel submit the weekly and monthly record keeping requirements for emission unit K001 and K002 for the period of June 1 through July 31, 2007; including information specified in Section C.1 and C.2 of the synthetic minor permit. This information should be submitted to CDO within 45 days of receipt of this letter.

Finding - Reporting requirements of quarterly deviations for K001 and K002:

A review of on-site and Ohio EPA in-house records established that reporting requirements were not met in accordance with the reporting requirements of Suburban Steel's synthetic Minor Permit issued October 21, 2004. Specifically, CDO has not received any quarterly deviation reports for K001 and K002 since the permit was issued. Section D.3. of the permit requires the following:

"The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following for emission units K001 and K002 combined;

- a. the coating VOC, HAP and/or HAPs content limitations,*
- b. The cleanup VOC, HAP, and/or HAPs content limitations,*
- c. beginning after the first 12 months of operation upon start up of either emission units K001 and K002, the rolling, 12-month coating usage limitation,*
- d. beginning after the first 12 months of operation upon start up of either emission units K001 and K002, the rolling, 12-month cleanup usage limitation,*
- e. the rolling, 12-month VOC, HAP and HAPs emission limitations,*

These quarterly deviation (excursion) reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A)(2).

Violation:

Failure to submit quarterly deviation reports is a violation of the synthetic minor permit and ORC 3704.05(c).

Action:

CDO requests that Suburban Steel immediately adhere to the reporting requirements as required in the synthetic minor permit.

CDO requests that Suburban Steel submit the required quarterly deviation reports for the first and second quarters of 2007 within 45 days of receipt of this letter

The following is a summary of actions that need to be taken by Suburban Steel in order to achieve compliance.

Summary of Actions for Remedy

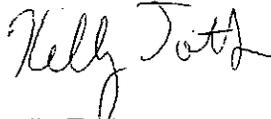
1. Suburban Steel should begin and maintain all required daily, weekly, and monthly record keeping for F001, K001, and K002.
2. Suburban Steel should submit for F001, K001, and K002 the daily, weekly, and monthly records for the period of June 1 through July 31 2007, to CDO within 45 days of receiving this letter.
3. Suburban Steel should submit quarterly deviation reports for F001, K001, and K002 for the first and second quarters of 2007 within 45 days of receiving this letter.

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 requested compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

Mr. Steve Heimberger
Suburban Steel
Page -9-

If you have any questions, please do not hesitate to contact me or Natalie Jalil at (614)-995-0672.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Toth".

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

c: Natalie S. Jalil, DAPC/CDO
Isaac A. Robinson III, DAPC/CDO
John Paulian, DAPC/CO