

Jefferson County  
Tube City  
0641090127  
Correspondence



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

March 28, 2008

Re: Jefferson County  
Tube City, LLC dba IMS Division  
Facility ID # 0641090127  
Inspection-Warning Letter  
Non-HPV  
Certified: 70063450000190560884

Michael Connolly  
Tube City, LLC dba IMS Division  
1155 Business Center Dr.  
Horsham, PA 19044-3454

Dear Mr. Connolly:

On March 6, 2008, I met with Jerry Hamby and performed an inspection of Tube City IMS. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations. I have enclosed a copy of the completed inspection forms for your reference.

Tube City IMS's FESOP application was received on 9/6/2002. The application is currently under review. During the inspection, I reviewed records required by the permits to install and performed a visual inspection of the facility. Based on this review, the following violations were noted.

- F014, Slag processing plant:** Failure to perform required visible emissions readings using USEPA Method 9 on each transfer point, crusher, and screen that is part of F014 on a monthly basis in violation of Part III. Section A.III.6 of PTI #06-06893. Failure to submit an annual report indicating the actual amount of slag loaded in the primary feeder as required by Part III. Section A.IV.5 of PTI #06-06893. Please submit a report detailing the annual slag loading amounts for each of the last five years.
- F101, Portable BOF slag and C scrap plant:** Failure to perform required monitoring and recordkeeping of material handling operations for visible particulate emissions in violation of Part III. Section A.III.1 and A.III.4 of PTI #06-06393. Please submit a copy of the record keeping data sheets for review.
- F102, Unprocessed and processed upgrade plant storage piles:** Failure to perform required monitoring and recordkeeping of storage piles for visible particulate emissions in violation of Part III. Section A.III. 1, 2, 3, and 7 of PTI #06-06393. Please submit a copy of the record keeping data sheets for review.

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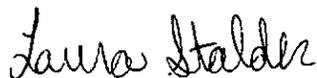
- 4. P101, 150 HP diesel engine for plant operation:** This emissions unit has been permanently removed from the plant. Please send notification of the removal of emissions unit P101, including date of shutdown and removal.

Please submit to this office, **within 30 days of receipt of this letter**, the above requested information and a compliance plan and schedule that addresses how Tube City IMS will achieve compliance with the violations noted in items 1-3 above.

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

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) 380-5253 or email [laura.stalder@epa.state.oh.us](mailto:laura.stalder@epa.state.oh.us).

Sincerely,



Laura Stalder  
Environmental Specialist 2  
Division of Air Pollution Control  
Southeast District Office

LS/mlm

Enclosure