



**Environmental
Protection Agency**

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

June 27, 2012

Re: Washington County
Skyline Steel
Facility ID # 0684010138
Notice of Violation
Non-HPV
Certified: 70102780000197044466

Dennis Bates
Skyline Steel, LLC
12355 State Route 7
Belpre, OH 45174

Dear Mr. Bates:

On June 6, 2012, Lesley Jenkins and I performed an inspection of Skyline Steel, LLC located in Belpre, Ohio. This inspection was conducted in order to determine the facility's compliance with state and federal air pollution rules and regulations.

While at the facility, we met with you as the Coating Manager for the Skyline Steel facility. During the visit, we reviewed records and performed visual inspections of the facility. Accompanying this letter is a copy of Ohio EPA's Facility Inspection Forms (Appendix N).

At this time, the facility's only permitted emissions unit is the steel coating line controlled with a paper filter (K001). The emission unit is currently permitted under the Federally Enforceable Permit-to-install and Operate (FEPTIO) P0107462, issued December 22, 2011. The FEPTIO P0107462 expires on December 22, 2016; therefore no renewal application is currently due for this emissions unit.

At the time of the inspections K001 was observed in operation. Based on my inspection, file review, and reports submitted by Skyline Steel, LLC, I observed the following issues or violations:

During the site visit I viewed the records required by FEPTIO P0107462. The following records were either incomplete or unavailable to view during the inspection:

- The record of the daily volume-weighted average VOC content of all coatings, as applied as required by C)1.d)(1)c. of FEPTIO P0107462;
- The record of the rolling, 12-month summation of the individual HAP emissions as required by C)1.d)(2)j. of FEPTIO P0107462; and
- The record of the rolling, 12-month summation of the VOC emissions as required by C)1.d)(2)i. of FEPTIO P0107462.

Dennis Bates
Skyline Steel, LLC
June 27, 2012
Page 2

In addition, the facility has failed to keep detailed records of the inspections for the dry particulate filter system as required by C) 1.d)(6) of FEPTIO P0107462. Though the inspections appear to be logged at the facility, the information provided did not include the name of the person that performed the inspection or the maintenance and repairs (i.e. changing of filters) that occurred.

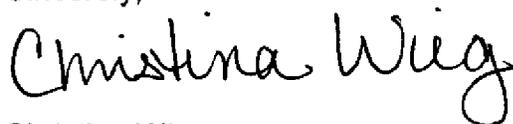
I am aware that the facility is using a private consultant company to assist in the record keeping at Skyline Steel. You indicated during the inspection that some of the above records may be kept outside of the office and provided to the facility on a quarterly basis. However, as stated in the Standard Terms and Conditions of the FEPTIO A.3. the facility must make the required records available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

Within 30 days of receipt of this letter, Skyline Steel shall submit a plan and schedule to return the facility to compliance. The plan should include a timeline for completing corrective actions and the corrective actions taken.

Acceptance by Ohio EPA of a schedule for compliance does not constitute a waiver of 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 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) 380-5223.

Sincerely,



Christina Wieg
Environmental Specialist III
Division of Air Pollution Control
Southeast District Office Ohio EPA

CW/cs

cc: Dean Ponchak, DAPC/SEDO

Enclosure: Ohio EPA's Facility Inspection Form (Appendix N)