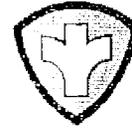


# AIR POLLUTION CONTROL DIVISION

OHIO EPA APC CONTRACTUAL REPRESENTATIVE SERVING ALL OF STARK COUNTY



**Public Health**  
Prevent. Promote. Protect.

TERRI A. DZIENIS  
APCD ADMINISTRATOR

JAMES M. ADAMS, RS, MPH  
HEALTH COMMISSIONER

## CANTON CITY HEALTH DEPARTMENT

420 MARKET AVENUE NORTH  
CANTON, OHIO 44702-1544  
PHONE: (330) 489-3385 • FAX: (330) 489-3335  
WEB: WWW.CANTONHEALTH.ORG

### CERTIFIED MAIL

JUNE 26, 2013

Mr. Jeff Ferg  
Republic Steel Co.  
2633 Eighth Street N.E.  
Canton, OH 44704-2311

# COPY

**Re: NOTICE OF VIOLATION**  
**Failed Stack Test for P142 Mecana Shot Blaster**  
**Republic Steel located at 2633 8<sup>th</sup> Street NE, Canton, OH 44704**  
**Facility ID # 15 76 05 0694**

Dear Mr. Ferg:

On February 8, 2013, Grace Consulting Inc. was at your facility indicated above and performed a stack test on the baghouse outlet stack of emission unit P142 Mecana Shot Blaster to measure concentration of particulate matter (PM) and lead (Pb). This test was conducted to demonstrate compliance with the emission limitations in Permit-To-Install (PTI) 15-1340, which is the current active permit for P142. Grace Consulting issued their final report, and this office received the report on March 7, 2013. The results of the stack test and the emission limits in PTI 15-1340 are shown in the table below:

| Pollutant          | Test Result           | Permit Limit   |
|--------------------|-----------------------|----------------|
| Particulate Matter | 1.75 lbs/hr           | 0.76 lbs/hr    |
| Particulate Matter | 0.0621 gr/dscf        | 0.0052 gr/dscf |
| PM <sub>10</sub>   | No Results/Not tested | 0.46 lbs/hr    |
| Lead               | 0.000144 lbs/hr       | 0.003 lbs/hr   |

Below is a summary of the findings, violations, and actions that need to be addressed. Please be aware that these findings and the actions completed have been communicated during our monthly meetings. This letter formulizes those conversations.

**Finding #1:**

Emission unit P142 Mecana Shot Blaster failed to meet the gr/dscf and lb/hr permit emission limit for particulate matter as demonstrated in the 02/08/13 stack test results. P142 is controlled by Wheelabrator baghouse BGHS26. P142 is considered an insignificant emission unit (IEU) for the purposes of Title V permitting. The facility is considered a major source (Title V source) and is major for particulate matter emissions (greater than 100 tons per year).

**Violation of:**

Particulate matter (PM) emission limits listed in PTI 15-1340, issued January 27, 1999 (Page 9 of 117), established pursuant to Ohio Administrative Code (OAC) rule 3745-31-05 and determined to be Best Available Technology (BAT).

**Finding #2:**

Y900

The particulate matter lb/hr stack test result is higher than the PM<sub>10</sub> lb/hr permit emission limit. PTI 15-1340 requires a determination be performed to determine the amount of particulate matter collected which represents PM<sub>10</sub> in this case. No PM<sub>10</sub> results were included in the stack test report.

**Violation of:**

PTI 15-1340, issued January 27, 1999, Additional Special Term and Condition X.D.2.c. (Page 71 of 117), which states the following:

*"The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PM utilizing test Method 5, 40 CFR Part 60, Appendix A...If the tested emission rate for PM exceeds the allowable emission rate for PM<sub>10</sub>, then a determination of how much of the PM was PM<sub>10</sub> shall be made to ensure compliance."*

Also, regarding Finding #'s 1-2 above, violation of the terms and conditions of an active PTI is also considered 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."*

**Requested Actions:**

This agency requests the following actions be completed and submitted, by email or postal mail, by no later than July 10, 2013:

1. A written plan of what procedure/method will be performed to determine the PM<sub>10</sub> portion of the particulate matter collected during the 02/08/2013 stack test, by what date the determination will be completed and by what date the results of PM<sub>10</sub> in lbs/hr will be submitted to this office. An example of an acceptable determination procedure is a particle size distribution.
2. A written detailed list with completion dates of the actions taken since the 02/08/2013 stack test to correct the above listed violations. This should include any additional measures that have been taken to reduce particulate matter emissions.
3. A written detailed compliance plan and schedule of actions to still be completed that includes retesting of the emission unit. Please note that if you decide to replace all the filter bags within the baghouse, a minimum of 60 days is required before a stack test can be acceptable.

If additional time is needed to complete any of the above requests, please request a time extension with reason in writing.

**Additional Information:**

Please note also that this letter or information pursuant to this letter 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. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me by phone at 330-489-3385 or by email at [gclark@cantonhealth.org](mailto:gclark@cantonhealth.org).

Sincerely,



Gregory A. Clark, CHMM, CAHES  
Air Pollution Control Engineer

cc: Bruce Weinberg, Ohio EPA Central Office DAPC, via email  
Brian Dickens, U.S. EPA Region 5, via email  
Republic Steel Stack Test File  
Correspondence File  
GA Clark

| SENDER: COMPLETE THIS SECTION  |  | COMPLETE THIS SECTION ON DELIVERY   |  |
|--|--|---|--|
| <ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> |  | A. Signature <input checked="" type="checkbox"/> Agent<br><input checked="" type="checkbox"/> Addressee   |  |
| 1. Article Addressed to:<br><br>Jeff Ferg<br>Republic Steel Co.<br>2633 8 <sup>th</sup> St NE<br>Canton, OH 44704-2311   |  | B. Received by (Printed Name) <input checked="" type="checkbox"/> Date of Delivery<br>Karl Miller 6/26/13   |  |
|  |  | D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br>If YES, enter delivery address below: <input type="checkbox"/> No   |  |
|  |  | 3. Service Type<br><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail<br><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. |  |
|  |  | 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes  |  |
| 2. Article Number<br>(Transfer from service label)   |  | 7012 1010 0003 5354 3818  |  |
| PS Form 3811, February 2004  |  | Domestic Return Receipt   |  |
|  |  | 102595-02-M-1540  |  |

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| Restricted Delivery Fee<br>(Endorsement Required) |         |
| Total Postage & Fees                              | \$ 6.11 |

37 MARKET STATION  
CANTON, OHIO 44702  
JUN 26 2013  
Postmark Here

Sent To: Jeff Ferg, Republic Steel Co.  
Street, Apt. No., or PO Box No.: 2633 8<sup>th</sup> ST NE  
City, State, ZIP+4: Canton, OH 44704-2311

PS Form 3800, August 2006 See Reverse for Instructions

7012 1010 0003 5354 3818