

**HAMILTON COUNTY**  
**ENVIRONMENTAL**  
**S E R V I C E S**

1/12/2012

Certified Mail

Pat Gallo  
AK Steel Corporation  
1801 Crawford Street  
Middletown, OH 45043-0001

Re: NOTICE OF VIOLATION -  
Facility ID: 1409010006  
AK Steel Corporation  
Location: 1801 Crawford Street,  
Middletown, OH 45043-0001  
Butler County

Dear Pat Gallo:

On January 9, 2012, an Environmental Compliance Specialist from the Southwest Ohio Air Quality Agency ("Agency") observed fugitive particulate emissions coming from the roof of the Basic Oxygen Process Furnace (BOPF) shop at AK Steel Corporation in Middletown. The Specialist performed Method 9 visible emissions observations of the fugitive dust clouds beginning at 5:13 PM. This observation showed a three minute average opacity at 41.3%. The visible emissions opacity limit from any opening at the Basic Oxygen Furnace Shop is 20% as a three minute average.

AK Steel has been sent Notices of Violation for excess fugitive emissions from the BOPF shop four times in 2010 and twice in 2011. Since the last Notice of Violation was sent, February 7, 2011 there have been four documented exceedances of the 20% opacity limit not counting the exceedance documented January 9, 2012:

|                |                                |
|----------------|--------------------------------|
| June 1, 2011   | Opacity was observed at 67.9 % |
| June 2, 2011   | Opacity was observed at 45.8 % |
| July 2, 2011   | Opacity was observed at 23.8 % |
| August 4, 2011 | Opacity was observed at 33.3%  |

Failing to maintain the opacity of secondary emissions that exit any opening in the Basic Oxygen Process Furnace shop at or below 20% on a three minute average is a violation of 40 CFR Part 63, Subpart FFFFF, the National Emissions Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities and a violation of the terms and conditions of AK Steel's Title V Operating Permit for emissions units P926 and P927.

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Mike Ploetz.

Pat Gallo  
AK Steel Corporation  
1/12/11  
Page 2

Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact me at 513-946-7752 or E-mail at [mike.ploetz@hamilton-co.org](mailto:mike.ploetz@hamilton-co.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Ploetz", with a stylized flourish at the end.

Mike Ploetz  
Southwest Ohio Air Quality Agency

cc: Tom Kalman, Central Office, Ohio EPA  
William MacDowell, Region 5 U.S. EPA