



Environmental  
Protection Agency

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

FILE COPY

CERTIFIED MAIL # 91 7108 2133 3932 1838 3849

April 5, 2012

Andy Kolarsky  
PSC Metals Incorporated  
2205 Parsons Avenue  
Columbus, OH 43207

Re: **Notice of Violation** based upon the April 3, 2012 compliant investigation at  
PSC Metals Incorporated, Facility ID # 0125040225

Dear Mr. Kolarsky:

On Tuesday, April 3, 2012, the Ohio EPA Central District Office (CDO) received a complaint regarding emissions originating from PSC Metals Incorporated (PSC), located at 2205 Parsons Avenue, Columbus, Ohio. CDO personnel responded to that complaint with a site visit at approximately 11:00 a.m.. The investigation into the alleged complaint included a U.S. EPA Method 9 visible emission observation.

Listed below are "Findings", based upon CDO observations. The findings are followed by "Violations" and "Requested Actions" necessary to address the stated findings and violations.

**Finding: Excess Visible Emissions from Shredder**

CDO personnel observed excess visible emissions from emission unit P901 (50 ton per hour shredder) - and performed visible emission observations in accordance with U.S. EPA Method 9. The effective permit for the shredder (P0103681, issued September 15, 2008) limits fugitive emissions to 20 percent opacity, as a 3-minute average. During the time of observation the 3-minute average readings were documented between 29.2 and 26.9 percent opacity (see attached Method 9 form), due to a possible malfunction of the water suppression system.

Following CDO's site visit, facility personnel stated that they would shut down the emissions unit and conduct an inspection to check the spray nozzles and their functionality.

**Violations**

Operation of emissions unit (P901) with excess visible emissions is a violation of OAC rule 3745-17-07(B) and the terms and conditions of PTIO No. P0103681, C.1.b)(1) which states:

*"Visible PE from any fugitive dust source shall not exceed 20 percent opacity, as a 3-minute average."*

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Operation of emissions unit P901 without sufficient water spray to comply with the applicable visible emissions limitation is a violation of OAC rule 3745-17-08(B) and the operational restrictions of PTIO No. P0103681, C.1.c)(1) which states:

*"Water sprays shall be operated at points necessary to ensure compliance with the visible PE limitations specified above."*

Violations of the permit terms and conditions of an effective permit are also considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

*"No person who is the holder of a permit....shall violate any of its terms or conditions."*

### **Requested Action**

CDO requests that within 30 days of receipt of this letter, PSC submit a plan and schedule to prevent further excess visible emissions from the shredder in order to return the emissions unit to compliance. The plan may include a schedule for regular inspection, preventative maintenance, and/or additional monitoring to ensure continuous operation of the water suppression system.

Please note that Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver or Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by the Ohio EPA at a later date.

If you have any questions regarding this letter, please contact Matthew Woods at (614) 728-8471 or [matthew.woods@epa.state.oh.us](mailto:matthew.woods@epa.state.oh.us).

Sincerely,



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

Attached: Method 9 Observation Form

c: Adam Ward, Air Unit Manager, DAPC/CDO  
John McGreevy, Supervisor, Permits and Compliance, DAPC/CDO  
Matthew Woods, DAPC/CDO  
John Paulian, DAPC/CDO