



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

January 14, 2009

RE: REPUBLIC ENGINEERED PRODUCTS
DAPC FACILITY ID # 02 47.08 0229
NOTICE OF VIOLATION
HIGH PRIORITY VIOLATION GC 8
(Violation of allowable emissions limit
detected during a reference method
stack test)

Mr. Jay Lawniczak
Environmental Manager
Republic Engineered Products
1807 E. 28th Street
Lorain, OH 44055

Dear Mr. Lawniczak:

Ohio EPA is issuing a Notice of Violation to Republic Engineered Products ("Republic") for not complying with the emissions limit for nitrogen oxides (NOx) from the Bloom Reheat furnace, emissions unit P081.

Republic is currently operating under a Title V permit. This permit was effective on June 20, 2003 and expired on June 20, 2008. The permit includes terms and conditions for emissions unit P081. These terms and conditions require Republic to conduct annual emissions testing for NOx. The emissions limit for NOx is 0.132 lb/MMBtu.

On November 12, 2008, Grace Consulting, Inc. performed emission testing for NOx on emissions unit P081. I witnessed this test.

This office has received a copy of the test report. A review of the test results was completed, and it was determined that NOx emissions exceeded the limit of 0.132 lb/MMBtu. The average emissions rate, based on three one-hour test runs, was 0.230 lb/MMBtu.

As discussed, Republic hired a contractor, a combustion specialist, to diagnose the source of the high NOx emissions and make repairs to the furnace.

On December 19, 2008, Grace Consulting, Inc. re-tested the furnace for NOx. I witnessed this test. Based on preliminary data, obtained after the test, the average emissions rate was 0.056 lb/MMBtu.

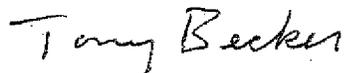
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Please submit a detailed compliance plan to obtain and maintain compliance with NOx emissions limit of 0.132 lb/MMBtu. **Compliance with this limit is to be achieved within thirty (30) days of receipt of this letter.** Failure to respond to this request in the requested time frame can result in a referral to the Central Office of Ohio EPA for the appropriate enforcement action.

The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06 or for U.S. EPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

If you have any questions concerning this letter, please contact me at (330) 963-1187.

Sincerely,



Tony Becker
Environmental Specialist
Division of Air Pollution Control

TB/mt

cc: Lisa Holscher, U.S. EPA Region V

ec: Tim Fischer, Ohio EPA, DAPC, NEDO
Dennis Bush, Ohio EPA, DAPC, NEDO
Tom Kalman, Ohio EPA, DAPC, CO