



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korfeski, Director

December 3, 2010

**CERTIFIED MAIL**

Mr. Steve May  
Add-Iron Corporation  
730 Miley Rd.  
North Lima, Ohio 44452

RE: CERTIFIED WARNING LETTER FOR PERMIT VIOLATIONS  
ADD-IRON CORPORATION  
DAPC FACILITY ID # 02 50 00 0948

Dear Mr. May:

On November 9, 2010, an inspection of Add-Iron Corporation was performed to determine compliance with the facility's air pollution permits and with Ohio's air pollution control laws. This inspection was performed in response to several complaints received by our local air agency, the Mahoning-Trumbull Air Pollution Control Agency (MTAPCA), regarding a red dust that has been observed on neighboring properties and roadways. The purpose of this letter is to provide a written follow-up to the inspection and to notify you that the facility is operating in violation of permit-to-install (PTI) #02-1497, issued September 10, 1997, and Ohio Revised Code (ORC) 3704.05(C).

Based upon the inspection, the following items need to be addressed:

- 1) The pressure drop across the baghouses for the material handling operations should be recorded daily, as stated in PTI #02-1497, Additional Special Terms and Conditions, section B.2. It is currently not being recorded at all. Please provide a copy of these completed daily records summarizing one week of data.
- 2) The ferrous sulfate dryer (P001) should be tested for compliance with the sulfur dioxide emission limitation as soon as possible. In a letter from our office dated January 10, 2000, the dryer was last tested on October 29, 1999 and was required to be tested within 5 years of that date (or by October 29, 2004). A copy of this letter is attached for your reference. Please provide a timeline for complying with this requirement.
- 3) The roadways on your property and the public roadway leading out of your property both had a covering of red dust. In PTI #02-1497, Additional Special Terms and Conditions, section B.5., the roadways are required to be swept and any material carried off of the property is required to be promptly removed. Please provide a timeline for complying with this requirement. This could include, but is not limited to, a plan to eliminate the source of the dragout, sweep or water the roadways on a regular basis, or some combination of these options.

MR. STEVE MAY  
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Please submit the above-requested information **within 21 days of receipt** of this letter.

The submission of the above information 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 such penalties in this case will be made by the Ohio EPA at a later date. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. Failure to respond within the specified time frame can result in further enforcement action, up to and including a referral to Ohio EPA's Central Office.

Should you have any questions regarding this matter, please feel free to contact me at (330) 963-1261.

Sincerely,



Jana L. Gannon  
Environmental Specialist  
Division of Air Pollution Control

JLG:bo

enclosure

ec: Tim Fischer, DAPC, NEDO  
Tara Cioffi, MTAPCA