



**Environmental
Protection Agency**

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

July 26, 2010

CERTIFIED MAIL

0750112010

Mr. Michael Phillips
Coronado Steel
2360 Funston Dr.
Youngstown, OH 44510

RE: CERTIFIED WARNING LETTER FOR OPERATING A SOURCE WITHOUT AIR
POLLUTION PERMITS AND INFORMATION REQUEST

Dear Mr. Phillips:

This letter serves to notify you that Coronado Steel (Coronado) is operating air emissions sources without a permit in violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(b) and Ohio Revised Code (ORC) 3704.05(G), and also to request additional information for processing your application.

As discussed during my site visits on June 18 and July 13, 2010, Coronado has been operating a steel foundry without air pollution permits since at least March 1, 1997. This is a violation of OAC Rule 3745-31-02(A)(1)(b), which states "no person shall cause, permit, or allow the installation or modification, and subsequent operation of any new source...without first obtaining a PTIO from the director." This applies to all air contaminant sources regardless of installation date. Compliance with the Ohio EPA rules regarding air pollution is not only required by state law, it is also important for the health and welfare of your community.

After my site visit on June 18 and request for emissions information, an application for a permit to install/operate (PTIO) was received during my visit on July 13. As part of the technical review of this application, the following information is needed in order to continue processing:

- 1) What is the manufacturer, model number, type (i.e., cartridge, reverse air, pulse jet, shaker, etc.), control efficiency (in percent) and air flow (in acfm, and if it is positive or negative pressure) of the baghouse for the sand mixing operation? During my visits, I noted that the baghouse is labeled Guyson, but I couldn't read the model number and faceplate because it was located too high on the baghouse. After you find the model number, you can contact the manufacturer to get more information on the baghouse. Also, a manometer will need to be installed on the baghouse, and the manufacturer should be able to provide a pressure drop range for best operation.

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- 2) The same information from Question 1 is needed for the shotblast baghouse.
- 3) A hole was noted in the tubing leading from the sand silo to the sand mixer baghouse. This hole must be fixed as soon as possible to prevent air emissions of fugitive sand. Please respond with the date that the hole was corrected. Also, please provide a maintenance schedule for both the sand mixer baghouse and shotblast baghouse, listing the frequency of bag inspections and changeouts, and the frequency of emptying the hoppers below them.
- 4) The seal around the Pangborn 6LK-7 shotblast was not operating properly, and some of the blasting material was escaping during my visit on June 18. Please respond with the date that this seal was fixed.
- 5) What is the usage (in lbs or gal/yr) of the binders used in mold making operation, and what is the volatile organic compound (VOC) content (in lbs/gal) of each? Since I couldn't locate the VOC content on the material data safety data sheets (MSDS), the manufacturer should be able to provide this information.
- 6) What is the VOC content of the mold washes and mold release?
- 7) Please provide a summary of the annual steel production (in tons per year) since the purchase date of your company.
- 8) Due to the usage of phenol in your binder, state air toxics modeling will need to be performed. I can complete this modeling if the following information is provided for the sand mixing area: the flow rate of the nearest powered fan that is vented outside, and its dimensions; the height of the fan from the floor; the building height, width and length; and the minimum distance to the nearest fence line.

In addition to the air permit, your company is subject to 40 CFR Part 63 Subpart ZZZZZ, the National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources. Per 63.10880(f) and 63.10890(b), a Notification of Size Classification identifying your area source as a small foundry was due on January 2, 2009. Per 63.10890(c), a Notification of Compliance Status for Management Practices for Metallic Scrap and Binder Formulations was due February 1, 2009, and a Notification of Compliance Status for Management Practices for Mercury Switch Removal was due February 3, 2010. Since Ohio has not been delegated the authority for these regulations, the completed forms should be sent to the U.S.EPA's Region V office. See the attached forms which can be used for these notifications, and a list containing the mailing address.

Be advised that violations of state air pollution regulations are punishable by civil penalty of \$25,000 per violation. Please submit the above-requested information within **30 days of receipt of this letter.**

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 USEPA 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. 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.

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If you have any questions, please do not hesitate to contact me at (330) 963-1261.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control

JLG:bo

enclosures

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