



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

August 23, 2007

RE: REPUBLIC ENGINEERED PRODUCTS  
DAPC FACILITY ID # 02 47 08 0229  
NOTICE OF VIOLATION

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

Dear Mr. Lawniczak:

Ohio EPA is issuing Republic Engineered Products ("Republic") in Lorain, Ohio a Notice of Violation for exceeding the visible emission standard for fugitive dust from the BOP shop.

On August 10, 2007, during a facility inspection, Mr. Tim Fischer saw fugitive particulate emissions being emitted from the east end of the building. At the time, the "L" Vessel was operating. Visible particulate readings were recorded using US EPA Method 9. The highest average opacity was 40% as a 3-minute period, which exceeded the standard of 20% opacity as a 3-minute average. See attachment.

On August 6, 2007, similarly emissions were observed. These emissions were whitish-gray in appearance and were emitted at the east and west ends of the BOP shop building. On this day, you explained to me that the emissions were the result of adding salt to the lowered vessel, after the blow from the oxygen lance. Salt is used as a flux. It is not used on every heat, but is used when called for when controlling slag in the vessel.

Please provide me a written explanation for the nature of the emissions when using salt in the Vessel and what steps will be taken to prevent the excessive emissions from occurring again, including a timeline. In your submittal, please include the types of salts added to the Vessel, the position of the Vessel when the salt is added and a drawing of the pick-up points from the AQC baghouse in respect to the aisles in the BOP shop. Please submit all information requested by this letter within fourteen (14) 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 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.

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

Sincerely,

Tony Becker  
Environmental Specialist  
Division of Air Pollution

TB:bo

Enclosure

ec: Bob Prinic, Ohio EPA, NEDO, DAPC  
Tim Fischer, Ohio EPA, NEDO, DAPC  
cc: Reza Bagherian, US EPA, Region V