



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 Korfeski, Director

March 12, 2008

RE: REPUBLIC ENGINEERED PRODUCTS  
DAPC FACILITY ID # 02 47 08 0229  
SECOND NOTICE OF VIOLATION  
HIGH PRIORITY VIOLATION GC 8

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 a second Notice of Violation to Republic Engineered Products ("Republic") for not complying with the emissions limit for nitrogen oxides (NO<sub>x</sub>) 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 expires 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 NO<sub>x</sub>. The emissions limit for NO<sub>x</sub> is 0.132 lb/MMBtu.

On November 13, 2007, Grace Consulting, Inc. performed emissions testing for NO<sub>x</sub> on emissions unit P081.

On December 20, 2007, I arrived at the plant for the retest of emissions unit P081. Republic cancelled the retest because the preliminary data from the emissions analyzers indicated high emissions readings for NO<sub>x</sub> and oxygen. At the time of the test, Republic was investigating the cause of the high emissions.

Ohio EPA issued a NOV letter, dated January 2, 2008, to Republic for exceeding the NO<sub>x</sub> emissions limit of 0.132 lb/MMBtu. The average emissions rate, based on three one-hour test runs, was 0.141 lb/MMBtu for the November 13, 2007, test. A compliance plan was requested to bring the emissions unit back into compliance with NO<sub>x</sub> emissions limit of 0.132 lb/MMBtu within 30 days.

Ohio EPA received a response letter including a compliance plan, dated January 21, 2008, from Republic. Republic hired a contractor, Core Engineering, a combustion specialist to evaluate the emissions unit. Core Engineering made a site visit on January 22, 2008, and made recommendations.

MR. JAY LAWNICZAK  
MARCH 12, 2008  
PAGE 2

On February 6, 2008, I arrived at the plant for the retest of emissions unit P081. Republic cancelled the retest because the preliminary data from the emissions analyzers indicated high emissions readings for NOx and oxygen.

Ohio EPA received an e-mail from Republic on February 19, 2008. Republic had scheduled a site visit for Core Engineering to re-evaluate the emissions unit P081. Core Engineering was scheduled to visit the plant on February 28 and 29, 2008.

On March 10, 2008, you phoned and told me what progress was being made to bring the emissions unit back into compliance. Core Engineering re-evaluated the unit and made recommendations. Those recommendations are to be implemented in an upcoming five-day outage.

Ohio EPA requests notification when the recommendations have been implemented and when the unit is ready for retesting. We are concerned with the length of time Republic has taken in its attempts to return emissions unit P081 back into compliance with the NOx emissions limit of 0.132 lb/MMBtu. If Republic determines that compliance with its emissions limit cannot be achieved within fourteen (14) days of receipt of this letter, you are to provide Ohio EPA with a compliance plan that indicates when the emissions limit is expected to be met. 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:bo

ec: Bob Princic, DAPC-NEDO  
Dennis Bush, DAPC-NEDO  
Tom Kalman, DAPC-CO

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