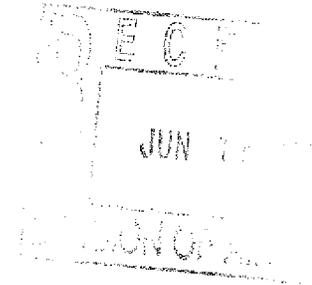




STEIN, INC.

June 12, 2009

City of Cleveland
Ms. Linda Kimmy
Cleveland Division of Air Quality
75 Erievue Plaza 2nd Floor
Cleveland, Ohio 44114-1839



Re: Notice of Violation
Facility ID: 13-18-00-3929

Dear Ms. Kimmy:

Stein, Inc. is in receipt of your Notice of Violation dated June 3, 2009: Submitting an inaccurate Annual V Compliance Certification, failure to submit 2009 first quarter deviation reports, failure to pay 2006, 2007 and 2008 city permit fees, and a question about our correct addresses. Your notice stated that a written response to the Notice must be received by Cleveland Division of Air Quality (CDAQ) within fourteen days of receipt of this letter.

Please be advised that this letter shall service as Stein, Inc.'s written response to said Notice of Violation. Stein, Inc. believes that there are either some misunderstandings or oversights regarding the basis for this Notice of Violation. Presented below is each failure listed in the Notice of Violation and a response to each issue.

Issue #1: Issue concerns whether or not the facility, specifically the operation at 2032 Campbell Road was in continuous or intermittent compliance during 2008.

Reply #1: Stein, Inc. believes that all sources located at 2032 Campbell Road have been and will continue to be operated in compliance with city, state, and Federal EPA air quality regulations. There may have been an error in interpreting the definition of continuous versus intermittent compliance. Specifically, the addition of an insignificant source through amending the Title V permit process in February, 2008 was thought to have met the intent of the regulation. Be advised that Stein, Inc. will amend its Annual Report for 2008 and resubmit through the Ohio EPA eBusiness Center.

Charge #2: Failure to electronically submit 2009 first quarter deviation reports.

Reply #2: Stein, Inc. wrongfully was under the impression that negative declarations for the quarter did not have to be reported. This will be corrected immediately. A late submission for the first quarter 2009 will be made. Quarterly

submissions thereafter, whether negative or not, will be made through Ohio EPA's eBusiness Center as required.

Charge #3: Stein, Inc. failed to pay 2006, 2007, and 2008 city permit fees.

Reply #3: Stein, Inc. never received an invoice from the City of Cleveland for the three years in question. This is the first time Stein representatives have seen these invoices. If Stein would have been invoiced in the past, these fees would have been paid. We have processed the three invoices for full payment and your department will receive payment within the 30-day time period.

Charge #4: Your letter indicated that the facility address was 2032 Campbell Road. Further, that Stein, Inc. should change the facility address as well as the mailing address.

Reply #4: Note that 2032 Campbell Road address is a field office for on-site employees. The address on East 45th Street has historically been the main business office for Stein's operation at that steel mill. However, since the recent shut down of the mill, our field business office is in a state of flux. The company's mailing address has not changed. Please direct all further notices or information to Stein, Inc.'s mailing address. Stein, Inc. will change the field office's address electronically as soon as one is officially established.

Please understand that the future of this particular steel mill is very uncertain. Stein, Inc. is trying to maintain its operation at a closed mill with no continuous source of product. Our company is working very hard to maintain these jobs in the city of Cleveland in hopes that the steel mill will start up again when economic conditions improve.

It is Stein Inc.'s intent to address and correct all of the issues identified in your letter. Our corrective action is to work with your agency and amicably resolve these issues. Stein requests that your office and staff works with our staff in a cooperative mode to correct any permit or reporting deficiencies. It is Stein's intent to be compliant with your agency as well as maintaining its long standing business in Cleveland. As already specified, corrections in electronic submittals will be made. Other issues identified will be addressed.

Stein, Inc. trusts that this letter has satisfactorily answered the concerns of CDAQ and will resolve the matter of the Notice of Violation. Please contact the

undersigned at (440) 526-9301 if you should have any questions or need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Conlon V.P.", written in a cursive style.

James E. Conlon
Vice President and General Counsel

ACCOUNTS PAYABLE



STEIN, INC.
 P.O. BOX 470548
 BROADVIEW HTS., OHIO 44147

014441

CHECK DATE

06/10/2009

FOUR HUNDRED TWELVE AND 50/100 DOLLARS

AMOUNT

*****412.50

PAY
 TO
 THE
 ORDER
 OF

TREASURER, CITY OF CLEVELAND
 DIVISION OF AIR QUALITY
 75 BRIEVIEW PLAZA, 2ND FLOOR
 CLEVELAND, OH 44114-1689

73-27
 421

FIFTH THIRD BANK

Frank G. Kelly
James V. Vance

⑈014441⑈ ⑆042100272⑆ 7480792188⑈

ENDOR NO.
 T0515



STEIN, INC.
 P.O. BOX 470548, BROADVIEW HTS., OH 44147
 (440) 526-9301

CHECK DATE

06/10/2009

CHECK NUMBER

014441

DATE	INVOICE NO.	GENERAL LEDGER NO.	REMARKS	GROSS AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
5/12/09	051209	552	1318003929	412.50	0.00	412.50
Totals:				412.50	0.00	412.50

Totals:

412.50

0.00

412.50