



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 70022030000118077736
RETURN RECEIPT REQUESTED

November 9, 2010

Mr. Jacob Lubbe
Charter Steel
4300 East 49th Street
Cuyahoga Heights, Ohio 44125

FACILITY ID: 13-18-17-1623
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Lubbe:

On September 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Charter Steel to submit a compliance plan that includes a timeline for annual burner tune ups for Emission Unit (EU) B008: 25 mmBtu/hr natural gas boiler for the VOD system equipped with a low Nitrogen Oxides (NOx) burner and for completing and submitting a NOx-RACT (Reasonably Available Control Technology) study for EU P029: 165 mmBtu/hr natural gas fired Bar Mill reheat furnace to equalize billet temperature prior to rolling; and EU P900: 110 TPH capacity Electric Arc Furnace (EAF) with direct evacuation control (DEC) for capture, and a baghouse for control of emissions. In addition, CDAQ requested Charter Steel provide a listing of any other NOx emitting units and note whether or not each unit is subject to NOx-RACT requirements.

CDAQ is in receipt of a corrective action plan dated November 1, 2010, which includes a timeline for developing a NOx-RACT study as follows: Finalize technical feasibility of control measures (per OAC 3745-110-03(D)(1)(h)) – November 5, 2010; finalize control measure cost-effectiveness (per OAC 3745-110-03 (D)(1)(j)) – November 30, 2010; finalize comparison discussion, recommendation definition of RACT, and implementation schedule (per OAC 3745-110-03(D)(1)(k-m)) – December 20, 2010; and prepare final submittal of NOx-RACT study to CDAQ and Ohio EPA – December 31, 2010.

In addition, CDAQ has received via e-mail a list of all NOx emitting EUs on November 5, 2010, and a timeline for annual burner tune ups on November 8, 2010.

The corrective action plan was received and appropriate steps were taken to bring the source into compliance with this violation. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA



for further enforcement action. Should you have any questions, please call Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Charter Steel: 13-18-17-1623.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/lk

cc: Matt Schroeder, Charter Steel
Tammy Bukach, Charter Steel
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Alan Harness, Ohio EPA, DAPC
Jim Orlemann, Ohio EPA, DAPC
William MacDowell, U.S. EPA Region V
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