



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7003 1010 0004 2923 4147
RETURN RECEIPT REQUESTED**

1/13/11

Joseph A. Higdon
BCS Metal Prep, LLC
c/o BCS Industries, LLC
P. O. Box 13191
Memphis, TN 38113-0191

**FACILITY ID: 13-18-53-2615
RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION**

Dear Mr. Higdon:

On 11/30/10, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that BCS Metal Prep, LLC (BCS Metal Prep) submit a 2010 third quarter deviation reports, maintain scrubber operating parameters records and install scrubber monitoring equipment. CDAQ received an e-mail message dated 12/30/10. The message indicated that a scrubber liquor pH probe and a pressure differential gauge were installed. A letter attached to the message also reported on deviations.

A meeting is set for 1/19/11 to further discuss the monitoring requirements of the permits-to-operate for emissions units P004 and P005. CDAQ requests that you submit your fourth quarter 2010 deviation by 1/31/11. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter to the following enforcement representative:

David Wagner
Cleveland Division of Air Quality
75 Erieview Plz. 2nd Fl.
Cleveland, OH 44114-1839



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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA facility identification number for BCS Metal Prep: 13-18-53-2615.

Sincerely,

Linda Kimmey for G.B.
George Baker
Chief of Enforcement, CDAQ

GB/dlw

cc: Brad Andrews, BCS Metal Prep
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318532615\2010-10-29 RCAP.docx

BCS Metal Prep, LLC

January 12, 2011

David Wagner
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

Reference: Facility I.D. 13-18-53-2615

Subject: 3Q 2010 Deviation Report

Dear Mr. Wagner:

- BCS did not operate P004 during 3Q 2010.
- BCS operated P005 3Q 2010 24/7
 - pH was monitored daily by test strips
 - Make up water flowed continuously at 10-12 gpm to maintain a pH > 3
 - The scrubber fan operated continuously
 - Static pressure drop was not continually monitored by a pressure gauge, however, amp readings on the scrubber fan confirmed the fan was running within operating parameters

Effective 12/9/10, pH, static pressure drop and water flow are continuously monitored and recorded daily.

Sincerely,

Bradley C. Andrews

Bradley C. Andrews
General Manager

Wagner, David

From: Wagner, David
Sent: Tuesday, January 04, 2011 4:04 PM
To: Kimmy, Linda
Subject: FW: Notice of violation response
Attachments: Pump curve for Solon 75000 cfh scrubber.pdf; 3Q 2010.doc

BCS Metal Prep's response to the NOV dated 11/30/10. Their email response is different than their attached letter response.

From: Brad Andrews [mailto:brad@bluffcitysteel.com]
Sent: Thursday, December 30, 2010 10:12 AM
To: Wagner, David
Subject: FW: Notice of violation response

Dear Mr. Wagner:

Please review our response to the Cleveland Division of Air Quality *Notice of Violation* dated 11/30/10.

1. EUs P004 & P005 PTO, Part I.3.b, ORC Section 3704.5© and (D)
 - 3rd quarter deviation reports attached
2. PTO, Part II, C, 1 - Equipment to continuously monitoring pH
 - A new pH probe was ordered and installed
 - The meter was calibrated per manufacturer's specifications
3. PTO, Part II, C, 2 – Equipment to continuously monitor pressure drop
 - A new differential pressure gauge was installed
 - The scrubber flow rate is determined by the manufacturer's pump curve

Please feel free to contact me with any questions.

Sincerely,

Bradley C. Andrews
General Manager

BCS Industries, LLC
31000 Solon Road
Solon, OH 44139

Telephone: 216-663-1100 Extension: 5101
Direct Dial: 440-264-2301
Facsimile: 440-349-4922
Mobile Telephone: 216-570-0233

www.besindustries.com

1/12/2011