



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

Re: Fulton County
NorthStar BlueScope Steel, LLC
Premise Number 0326000073
Resolution of Violation

September 11, 2012

Mr. Nathan Berry, EHS Manager
NorthStar BlueScope Steel, LLC
6767 County Road 9
Delta, Ohio 43515

Dear Mr. Berry:

This letter shall serve to resolve the Notice of Violation (NOV) issued to the above referenced facility on August 14, 2012. The Division of Air Pollution Control (DAPC) has reviewed the company's letter dated August 28, 2012, which responded to the NOV that was generated following a compliance inspection conducted on August 7, 2012. NorthStar BlueScope Steel (NSBS) has addressed the violations identified in the NOV with the following:

- (1) Ohio EPA requested NSBS to submit fugitive emissions calculations associated with the scrapyard operations located at the facility.

The facility has submitted the appropriate calculations to show the scrap loading and unloading operations to be de minimis pursuant to OAC rule 3745-15-05. Fugitive dust resulting from vehicular traffic is permitted under emissions unit F005, plant roadways and parking areas. Please be aware that the scrap and the scrap handling operations are subject to the requirements of 40 CFR, Part 63, Subpart YYYYYY, Electric Arc Furnace Steelmaking Facilities. These requirements will be incorporated into the company's renewal Title V (TV) operating permit.

- (2) The facility was not maintaining the appropriate records for emissions units P901-P903, pursuant to monitoring and recordkeeping requirements specified in A.III.6.c., A.III.6.d and A.III.7.c. of TV Permit P0086998, issued August 7, 2006. This office requested a summary of the rolling, 12-month summation of material production rates, fugitive emissions and stack emissions be submitted to this office.

NSBS provided updated rolling, 12-month production rates, fugitive emissions and stack emissions spreadsheets for P901-P903, combined, in an email dated August 10, 2012. A hardcopy was submitted August 28, 2012. The spreadsheets comply with the above specified monitoring and recordkeeping requirements.

- (3) NSBS was required to update the deviation report form submitted to this office and resubmit the last four quarterly reports to include P004, P016 and P017. An updated deviation report template was submitted to this office to include P004 and P016. No deviations were reported for either emissions unit for the last four quarters. Emissions unit P017 has been marked "Permanently Shut Down" in the facility profile through the Ohio EPA eBusiness Center: Air Services as it was never installed.

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- (4) NSBS is required to monitor the total dissolve solids (TDS) content for emissions unit P015. While the company has been complying with monitoring and recordkeeping requirement specified in A.III.1.a. of TV Permit P0086998, issued August 7, 2006, the recorded data was submitted in conductivity units uhoms where the permit limit is in ppm.

The company has since been maintaining records in uhoms and converting the data to ppm. Based on the information provided, NSBS has not exceeded the operational restriction of 1000 ppm.

- (5) Northwest District Office (NWDO) requested that the facility modify the visible emissions form currently maintained for the plant roadways and parking areas to more accurately reflect the recordkeeping requirements specified in A.III.4.a. through A.III.4.d., of TV Permit P0086998, issued August 7, 2006. NSBS has provided a copy of the modified visible emissions form.
- (6) This office requested that the facility profile in Ohio EPA eBusiness Center: Air Services be updated to reflect current facility contacts. The updated facility profile was completed August 16, 2012, making Nathan Berry the billing, on site and primary contact at the facility.

The violation(s) noted in the NOV letter have been addressed and are considered resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violation(s). The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address, by email at Alyse.Johnson@epa.state.oh.us or call (419) 373-3110.

Sincerely,



Alyse Johnson
Environmental Specialist
Division of Air Pollution and Control

/cg

cc: Alyse Johnson, NWDO - DAPC
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