



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Second Floor  
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 7011 3500 0000 1759 9789  
RETURN RECEIPT REQUESTED**

September 28, 2012

James Conlon  
Vice President  
Stein, Inc.  
1929 E. Royalton Road  
Broadview Heights, OH 44147

**FACILITY ID: 13-18-00-3929**

**RESOLUTION OF VIOLATIONS  
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Conlon:

On September 10, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Stein, Inc. to submit the following three items:

- a written corrective action plan to ensure that future Annual Title V Compliance Certifications are submitted on time;
- a quarterly deviation report for the 1<sup>st</sup> quarter of 2012 documenting the two weekly slag moisture content deviations on Emissions Units (EUs) F006: Slag crushing, screening and handling operation, F007: East side drop ball operation and F009: East side material handling (to be submitted electronically via the eBusiness Center); and
- a written corrective action plan detailing how the facility will prevent slag moisture content from falling under the required 4% on EUs F006, F007 and F009 in the future.

CDAQ is in receipt of a written corrective action plan (CAP) dated September 26, 2012, stating there are both manual and electronic schedule reminders in place to ensure timely submittal of future Annual Title V Compliance Certifications. Your CAP also states that slag moisture content will be maintained above the required 4%. The quarterly deviation report for the 1<sup>st</sup> quarter of 2012 was electronically submitted on September 23, 2012.



The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. 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 Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for Stein, Inc.: 13-18-00-3929.

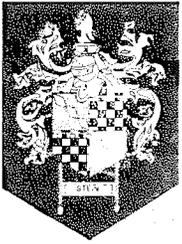
Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White  
Chief of Enforcement, CDAQ

VW/AM

cc: George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
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# STEIN, INC.

September 22, 2012

Mr. Andrew Marantides  
Cleveland Division of Air Quality  
75 Erieview Plaza  
Cleveland, Ohio 44114-1839

FACILITY IDENTIFICATION # 13-18-00-3929

Dear Mr. Marantides:

I am responding to a letter from your Agency written by Valencia White on September 10, 2012. Ms White's letter notified Stein, Inc. of two violations of Stein Inc's Air Permit for the Arcelor Mittall Cleveland Works.

The first violation alleges that Stein did not submit the Annual Title V Compliance Certification in a timely manner. The Certification was submitted to the EBiz site by Stein's consultant, Gary Nied on or before April 15, 2012. Other than Mr. Nied's written records, we have no proof of this date. I know that it is not unheard of for submissions to EBiz being lost in cyberspace for an extended period of time. We have created manual and electronic schedules and reminders for all of our required compliance matters with Ohio EPA that have built in redundancies to guarantee that this will never happen again.

The second violation alleges that Stein violated their Permit by permitting the moisture content of the slag to fall below 4% for the weeks of March 14 and March 22. As you know these moisture percentages are done retrospectively and provide guidance as to the effectiveness of the watering processes. There is also a real time report that visually evaluates the effectiveness for the mixing and watering programs. During the two weeks in question, there were no observations that reflected that the .50% and .30% moisture deviations had any effect on emissions. I'm sure that your agency also took into account that the average moisture content for the thirty-three weeks reviewed was 15.23%. Our corrective action for this violation is to maintain our watering and mixing procedures which have been effective in reducing emissions and to do a better job in collecting samples that reflect the actual moisture content of all of the subject material.

A revised Quarterly Deviation Report for the first quarter of 2012 reflecting the two weekly moisture percentage deviations was submitted today.

If you have any questions about this or any other matter, feel free to contact me at any time.

Respectfully,

A handwritten signature in black ink, appearing to read 'James Conlon', with a long, sweeping horizontal stroke extending to the right.

James Conlon

Vice President