

Air Pollution Control Division

Ohio | Environmental
Protection Agency

Canton City Health Department

420 Market Avenue North • Canton, Ohio • 44702-1544
(330) 489-3385 • Fax: (330) 489-3335

APC Contractual Representative
Serving All of Stark County

James M. Adams, RS, MPH
Health Commissioner

Terri A. Dzienis
APC Administrator

COPY November 6, 2012

CERTIFIED MAIL

Mr. Dennis Stropko
Safety and Environmental Manager,
Reserve Management Group
1831 East Highland Road
Twinsburg, OH 44087-2222

**Re: NOTICE OF VIOLATION
Failure to Comply With a Permit Term and Condition
Reserve Iron Ohio, Located at 1451 Trump Ave NE, Canton, OH
Facility ID # 15 76 05 5014**

Dear Mr. Stropko:

On November 2, 2012, the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) visited the facility of Reserve Iron Ohio site at 1451 Trump Ave NE in Canton in response to a citizen complaint. The complainant reported emissions of smoke coming from your Trump Ave. facility. I, and a member of the APCD Monitoring and Inspections Group arrived at approximately 9:15 a.m. and observed and photographed brown/orange smoke arising from a torch cutting operation. Further investigation revealed that the torch cutting was taking place outside of the enclosures of the baghouse. The torch operators stopped when I inquired of the operators who their supervisor was. They called over Mr. Guy Peake, the Operations Manager. I discussed the situation with Mr. Peake who agreed to move the torch cutting operations within the enclosure. The inspectors left the property at this point.

Below is a summary of the findings, violations, and actions that need to be addressed as a result of the investigation conducted by CCHD, APCD.

Finding 1:

On Friday, November 2, 2012 torch cutting operations were taking place at the Reserve Iron Ohio facility on Trump Ave outside of the enclosure which is vented to the baghouse. The torch cutting operations are permitted in Permit To Install and Operate (PTIO) P1017117 and identifies Emission Unit P901.

Violation:

Conducting torch cutting outside the enclosure is a failure to adhere to Operational Restriction C.1 c)(1) of PTIO P0107117 which states:

"All torch cutting operations shall be performed within the enclosure and the baghouse shall be operating at all times during torch cutting operations".

Violations of the terms and conditions of an issued PTIO are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Requested Actions:

Not later than December 15, 2012, please submit:

1. Written evidence that all supervisors and torch operators are trained in the terms and conditions of PTIO No. P0107117 to include the stipulation that all burning be conducted within the enclosure and that the baghouse shall be operating at all times during torch cutting operations.
2. Written evidence that Reserve Iron Ohio was in compliance on 11/02/2012 with their PTIO Monitoring and/or Recordkeeping Requirement C.1. d) (2) by providing a copy of the relevant page in the operations log documenting that the permittee performed the required daily checks for visible particulate emissions from the baghouse stack and fugitive visible emissions from non-stack egress points of the emission unit.

Please be aware that this failure to adhere to the PTIO operational restriction needs to be included in the annual PER as required by term C. 1. e) (3).

Please note also that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me at 330-489-3385 or via email to gclark@cantonhealth.org.

Sincerely,



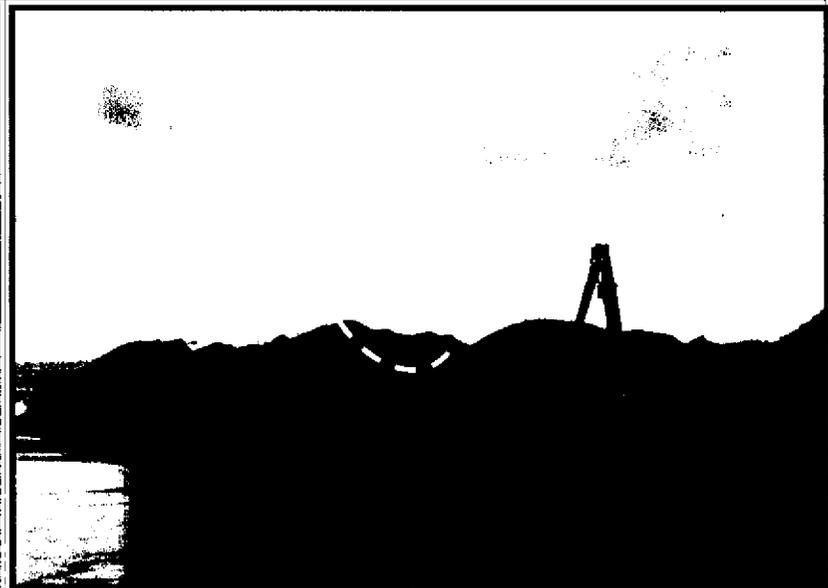
Gregory A. Clark, CAHES, CHMM
Air Pollution Control Engineer
Canton City Health Department

Enclosure: Photographs, 11/02/2012

cc: Bruce Weinberg, Ohio EPA Central Office, P.O. Box 1049, Columbus, OH 43216-1049
Brian Dickens, USEPA Region 5, 77 West Jackson Blvd., Chicago, IL 60604-3608
Reserve Iron Ohio, Complaints File
Correspondence File
GA Clark



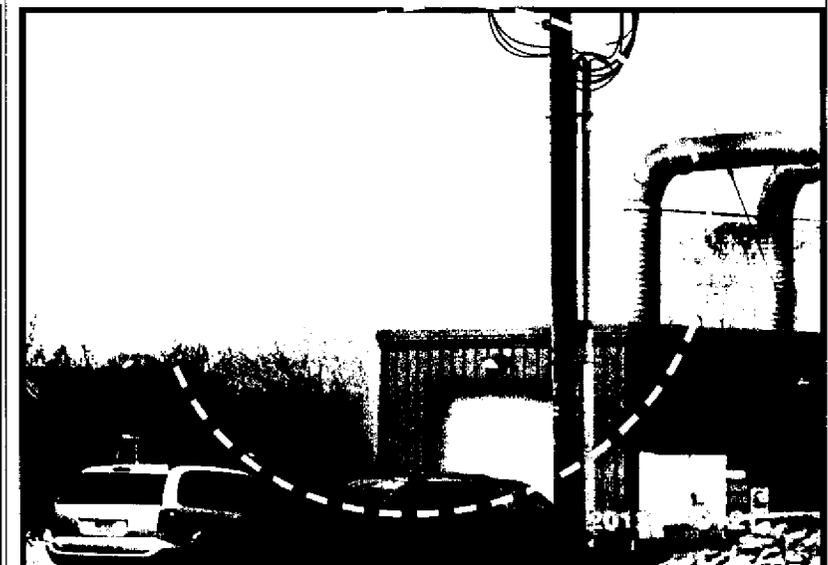
View from the street, showing emissions..



A second view from the street, showing emissions.



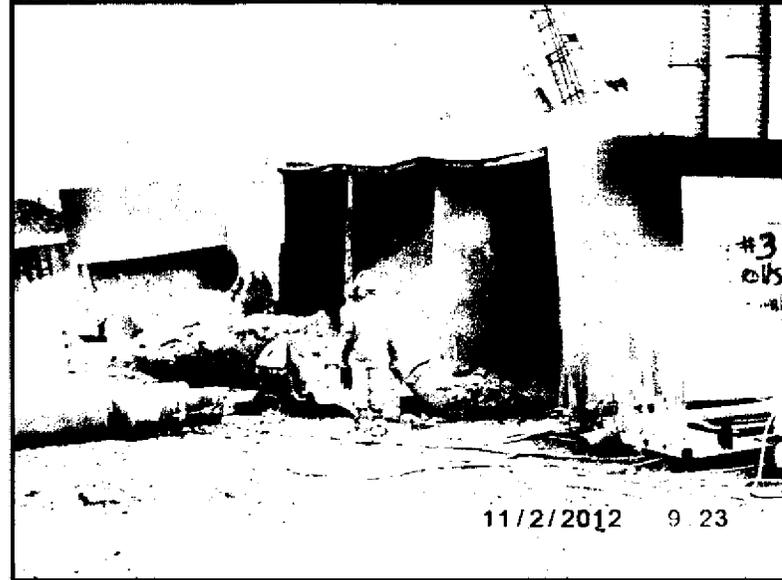
View from the property, showing the top of the baghouse.



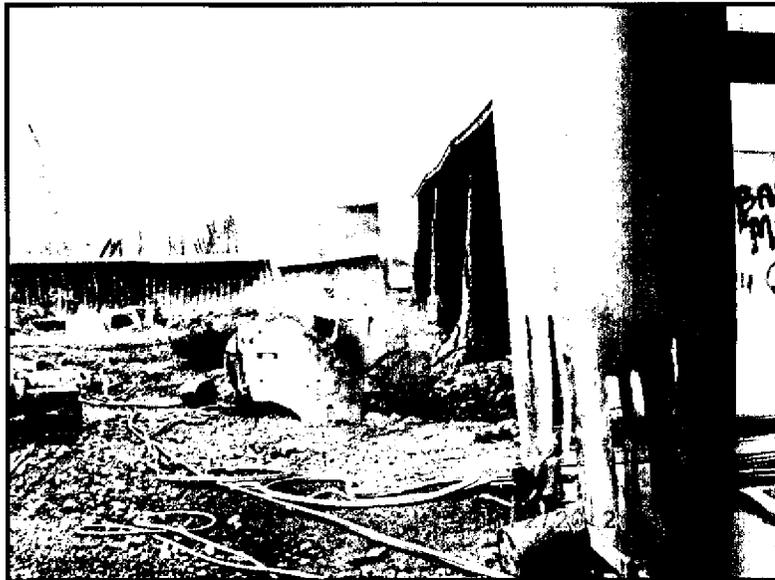
Close up view from the property.



View of work not in the baghouse enclosure.



A second view of work not in the baghouse enclosure.



Side view of work not in the baghouse enclosure.