

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	
)	
CSC Ltd.)	NOTICE OF VIOLATION
4000 Mahoning Avenue)	
Warren, OH 44483-1968)	EPA-5-99-OH-20
)	
Proceedings Pursuant to)	
Section 113 of the Clean Air Act,)	
42 U.S.C. § 7413)	

NOTICE OF VIOLATION

Pursuant to Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1), the State of Ohio and CSC Corporation (CSC) are hereby notified that the Administrator of the United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, finds CSC, at CSC's facility located in Warren, Ohio, in violation of the Ohio State Implementation Plan (SIP), adopted under the Section 110 of Act, 42 U.S.C. § 7410. Specifically, CSC violated the Ohio SIP, OAC 3745-17-07(A)(1)(b), by exceeding the limit for visible particulate emissions at its boiler stack house on July 25, 1996, August 8, 1996, September 10, 1996, September 19, 1996, October 1, 1996, and October 17, 1996.

REGULATORY AUTHORITY

1. Section 110 of the Act, 42 U.S.C. § 7410, requires each State to adopt and submit to the U.S. EPA for approval, SIPs providing for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS) promulgated by the U.S. EPA pursuant to Section 109 of the Act, 42 U.S.C. § 7409. The U.S. EPA has promulgated NAAQS for, among other things, particulate matter.
2. On May 27, 1994, U.S. EPA approved OAC 3745-17-07, Particulate Matter Standards, Visible Emission Limits, as part of the federally enforceable SIP (59 Fed. Reg. 27464). The effective date of the approval was June 27, 1994.
3. OAC 3745-17-07(A)(1)(b), Particulate Matter Standards, Visible Emission Limits, General Stack Limit, states, in applicable part, that visible particulate emissions from any stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

FINDINGS

12. CSC is a mini steel mill located at 4000 Mahoning Avenue, Warren, Trumbull County, Ohio.
13. On July 25, 1996, August 8, 1996, September 10, 1996, September 19, 1996, October 1, 1996, and October 17, 1996, Ted Davis of the Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO), Department of Air Pollution Control (DAPC), observed and recorded visible emissions from the boiler stack house.
14. Visible emissions from the boiler stacks exceeded the 20% opacity limits during the periods indicated in the table below. CSC is in violation of the Ohio SIP, OAC 3745-17-07(A) (1) (b) based on the following visible emission readings:

Date	Periods of Reading Time	Total Reading Time	Six-Minute Periods of Violation	Total Minutes of Violation	Period of Maximum Opacity During Day	Maximum Opacity
7/25/96	07:20 to 07:50 30 min	30	07:20 to 07:25 - 34% 07:26 to 07:31 - 35% 07:32 to 07:37 - 37% 07:38 to 07:43 - 35% 07:44 to 07:49 - 27%	24	07:32 to 07:37	37%
8/13/96	09:00 to 09:30 30 min	30	09:00 to 09:05 - 24% 09:06 to 09:11 - 25% 09:12 to 09:17 - 26% 09:18 to 09:23 - 24% 09:24 to 09:29 - 19%	18	09:12 to 09:17	26%
9/10/96	08:50 to 09:20 30 min	30	08:50 to 08:55 - 26% 08:56 to 09:01 - 24% 09:02 to 09:07 - 23% 09:08 to 09:13 - 21% 09:14 to 09:19 - 30%	24	09:14 to 09:19	30%
9/19/96	08:55 to 09:25 30 min	30	08:55 to 09:00 - 26% 09:01 to 09:06 - 24% 09:07 to 09:12 - 19% 09:13 to 09:18 - 22% 09:19 to 09:24 - 25%	18	08:55 to 09:00	26%
10/1/96	09:30 to 10:00 30 min	30	09:30 to 09:35 - 30% 09:36 to 09:41 - 37% 09:42 to 09:47 - 35% 09:48 to 09:53 - 34% 09:54 to 09:59 - 34%	24	09:36 to 09:41	37%
10/17/96	10:48 to 11:12 24 min	30	10:48 to 10:53 - 22% 10:54 to 10:59 - 23% 11:00 to 11:05 - 22% 11:06 to 11:11 - 24%	18	11:06 to 11:11	24%

NOTICE OF VIOLATION

The Administrator of the U.S. EPA, by authority duly delegated to the undersigned, hereby notified you and the State of Ohio that CSC, Ltd. is in violation of the Ohio State Implementation Plan as set forth in this Notice of Violation.

5-19-99
Date

Richard C Karl
Richard C. Karl, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, do hereby certify that a Notice of Violation Pursuant to the Clean Air Act was sent by Certified Mail, Return Receipt Requested, to:

Jack VanKirk, Manager of Environmental Affairs
CSC, Ltd.
4000 Mahoning Avenue
Warren, Ohio 44483-1968

Mr. Geoffrey K. Barnes
Squire, Sanders & Dempsey, L.L.P.
4900 Key Tower
127 Public Square
Cleveland, Ohio 44114-1304

I also certify that a copy of the Notice of Violation pursuant to the Clean Air Act was sent by first class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
Central District Office
Lazarus Government Center
Columbus, Ohio 43216-1049

Dennis Bush, APC Supervisor
Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087

on the 20th day of MAY 1999.


Loretta Shaffer, Secretary
AECAS (MN-OH)

P564 485 825
Certified Mail Number