

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)
)
National Steel Corporation) NOTICE OF VIOLATION
Granite City Division)
Granite City, Illinois) EPA-5-03-07-IL
)
)
Proceedings Pursuant to)
Section 113(a)(1) of the)
Clean Air Act, 42 U.S.C.)
§ 7413(a)(1))

NOTICE OF VIOLATION

The United States Environmental Protection Agency (U.S.EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). U.S. EPA finds that National Steel Corporation, Granite City Division (Granite City Steel) is violating the Illinois State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. On March 11, 1996, U.S. EPA approved 35 IAC § 212.446(c) as part of the federally enforceable SIP for Illinois. 63 Fed. Reg. 11842. This rule became Federally effective on May 11, 1998.
2. 35 IAC § 212.446(c) prohibits uncaptured emissions from any opening in the building housing the Basic Oxygen Furnace (BOF) shop to exceed an opacity of 20 percent at integrated iron and steel plants in the vicinity of Granite City, Illinois. This regulation specifies that compliance be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9, except that compliance shall be determined by averaging any 12 consecutive observations taken at 15 second intervals.

Granite City Steel's Facility

3. Granite City Steel owns and operates an integrated steel mill at 20th & State Streets in Granite City, Illinois, including a BOF shop.

4. Emissions from Granite City Steel's BOF shop are subject to the visible emissions regulations in the Illinois SIP at 35 IAC § 212.446(c).
5. Granite City Steel is required by one of its operating permits, No. 95010001, to conduct visible emission (VE) observation readings at the BOF shop roof monitor on at least a weekly basis using EPA Reference Method 9 (40 C.F.R. Part 60, Appendix A, Method 9).
6. Since at least 1998, Granite City Steel has contracted with Maxim Technologies, Inc., to conduct at least some of the required weekly VE readings at the BOF shop roof monitor.

Violations

7. On June 2, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

June 2, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
10:01:30am - 10:04:30am	30.4%
10:04:30am - 10:07:30am	30.0%
10:07:30am - 10:10:30am	28.3%

8. On June 16, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

June 16, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
08:22:00am - 08:25:00am	22.9%
08:35:45am - 08:38:45am	25.4%
08:45:15am - 08:48:15am	31.3%

9. On July 7, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

July 7, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
09:13:30am - 09:16:30am	20.8%

10. On July 17, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

July 17, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
11:52:45am - 11:55:45am	25.8%

11. On August 24, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

August 24, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
11:49:15am - 11:52:15am	37.1%

12. On September 15, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

September 15, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
09:28:00am - 09:31:00am	39.6%
09:31:00am - 09:34:00am	28.8%
09:43:45am - 09:46:45am	30.0%

13. On November 18, 1998, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

November 18, 1998 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
10:18:30am - 10:21:30am	30.8%
10:23:45am - 10:26:45am	57.9%
10:26:45am - 10:29:45am	82.9%
10:29:45am - 10:32:45am	98.8%
10:32:45am - 10:35:45am	66.7%

14. On January 29, 1999, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

January 29, 1999 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
10:43:00am - 10:46:00am	28.3%

15. On March 4, 1999, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

March 4, 1999 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
12:21:30am - 12:24:30am	24.2%

16. On April 8, 1999, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

April 8, 1999 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
08:26:15am - 08:29:15am	27.1%

17. On May 14, 1999, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

May 14, 1999 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
10:33:45am - 10:36:45am	27.1%
10:36:45am - 10:39:45am	25.8%

18. On August 24, 1999, Michael McLean, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

August 24, 1999 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
08:00:15am - 08:03:15am	23.3%
08:03:15am - 08:06:15am	22.5%

19. On June 5, 2002, Matthew J. Braundmeier, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

June 5, 2002 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
11:04:00am - 11:07:00am	25.8%
12:20:00pm - 12:23:00pm	24.6%

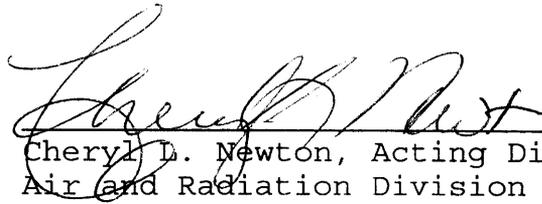
20. On July 17, 2002, Matthew J. Braundmeier, Maxim Technologies, Inc., observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

July 17, 2002 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
09:58:00am - 10:01:00am	27.1%
10:01:00am - 10:04:00am	23.8%
10:47:30am - 10:50:30am	29.2%
10:50:30am - 10:53:30am	30.8%

21. On September 5, 2002, Jeff Benbenek, Illinois EPA, observed visible emissions from Granite City Steel's BOF Shop Roof Monitor exceeding an average of 20% for 12 consecutive readings. This is a violation of 326 IAC 212.446(c).

September 5, 2002 - BOF Shop Roof Monitor	
Observation Period	12 Consecutive Readings
10:52:30am - 10:55:30am	42.9%
11:06:45am - 11:09:45am	54.1%

2/6/03
Date


Cheryl D. Newton, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-5-03-IL-07, by Certified Mail, Return Receipt Requested, to:

Michael D. Gibbons
Vice President/General Manager
Granite City Division
National Steel Corporation
20th & State Streets
Granite City, Illinois 62040

I also certify that I sent copies of the Notice of Violation by first class mail to:

Julie Armitage, Acting Manager
Compliance and Enforcement Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue
Springfield, Illinois

John Justice, Regional Manager
Region III
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, Illinois 60016

on the 4th day of February, 2003.


Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010326000601783271