UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 2 8 2012

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Pat Gallo
Environmental Manager
AK Steel Corporation, Middletown Works
1801 Crawford Street
Middletown, Ohio 45043

Dear Mr. Gallo:

This is to advise you that the U.S. Environmental Protection Agency (EPA) has determined that AK Steel Corporation, Middletown Works ("AK Steel" or "facility"), located at 1801 Crawford Street, Middletown, Ohio, is in violation of the provisions of the Clean Air Act (the "Act"), the Ohio State Implementation Plan ("SIP") and the Title V permit program implemented under the terms of the Act. We are today issuing to you a Notice and Finding of Violations (NOV/FOV) for these violations.

Our evidence for these violations derives from records received from AK Steel in response to EPA's Section 114 information request sent to AK Steel on September 13, 2011. Specifically, Appendix D of the September 13, 2011, Section 114 information request asked AK Steel to use the continuous opacity monitoring system (COMS) at the Wilputte Battery combustion stack to monitor, record, and maintain six-minute average opacity of emissions exiting the combustion stack for a period of 90 days. AK Steel responded to EPA's request by submitting the six-minute average opacity of emissions data on the following dates: November 18, 2011; December 20, 2011; and January 20, 2012.

By letter dated February 24, 2012, counsel for AK Steel disputed, among other things, the legal sufficiency of previous NOV/FOVs issued by EPA to AK Steel that were based, as the instant NOV/FOV is based, on COMS data collected at the Wilputte Battery; the United States will soon respond to AK counsel's legal objections separately from this letter.

Section 113 of the Act, 42 U.S.C. § 7413, gives EPA several enforcement options to resolve these violations, including issuing an administrative compliance order, issuing an administrative penalty order, bringing a civil judicial action, and bringing a criminal action. EPA is offering you the opportunity to request a conference with us about the violations alleged in the NOV/FOV. A conference should be requested within 10 days following receipt of this notice. A conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future

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violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

EPA's contact in this matter is Gina Harrison. If you wish to request a conference, you may call her at (312) 353-6956. EPA hopes that this NOV/FOV will encourage AK Steel's compliance with the requirements of the Act.

Sincerely,

George Czerniak
Acting Director
Air and Radiation Division

Enclosure

cc: Brad Miller
Hamilton County Department of Environmental Services

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

| | | |
|---|---|---|
| **IN THE MATTER OF:** | ) | |
| | ) | |
| **AK Steel Corporation, Middletown Works** | ) | **Proceedings Pursuant to Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3)** |
| **1801 Crawford Street** | ) | |
| **Middletown, Ohio 45043** | ) | |
| | ) | |
| | ) | EPA-5-12-OH-18 |
| | ) | |
| | ) | |

## NOTICE AND FINDING OF VIOLATIONS

The U.S. Environmental Protection Agency is issuing this Notice and Finding of Violations (NOV/FOV) to AK Steel Corporation, Middletown Works ("AK Steel" or "facility"), for violations of the Clean Air Act (the "Act"), including: Section 110 of the Act, 42 U.S.C. 7410; Title V of the Act, 42 U.S.C. §§ 7661a and 7661b; the Ohio State Implementation Plan (SIP); and the Title V permit program implemented under the Act at the AK Steel facility located at located at 1801 Crawford Street, Middletown, Ohio.

## I. STATUTORY AND REGULATORY BACKGROUND

### A. Ohio State Implementation Plan Requirements

1. EPA approved the Ohio Administrative Code (OAC) Chapter 3745-17-07(A)(1) as part of the federally enforceable Ohio SIP on May 27, 1994, at 59 Fed. Reg. 27464, and again on November 15, 2007, at 72 Fed. Reg. 58523.

2. OAC Chapter 3745-17-07(A)(1)(a) states that, with certain exceptions, visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average.

3. OAC Chapter 3745-17-07(A)(1)(b) states 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.

4. 40 C.F.R. § 52.23 provides that failure to comply with any approved regulatory provision of a SIP shall render the person so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement action under Section 113 of the Act.

## B. Title V Permit Requirements

5. Section 502(d)(1) of the Act, 42 U.S.C. § 7661a(d)(1), requires each state to develop and submit to EPA an operating permit program which meets the requirements of Title V. On August 15, 1995, EPA granted Ohio final approval of its Title V operating permit program, effective October 1, 1995. 60 Fed. Reg. 42045; 40 C.F.R. Part 70, App. A. Ohio's Title V operating permit regulations are codified at OAC Chapter 3745-77, and are federally enforceable under Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3).

6. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R.§ 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit.

7. Part III.A.I.1 of AK Steel's Title V permit for the Wilputte Battery, incorporating OAC Chapter 3745-17-07(A)(1)(a) requirements, states visible particulate emissions from the combustion stack shall not exceed twenty percent opacity as a six-minute average, except as provided by OAC Chapter 3745-17-07(A)(1)(b).

8. Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), authorizes the Administrator of EPA to initiate an enforcement action whenever the Administrator finds that any person has violated, or is in violation of, a requirement or prohibition of Title V or any permit or rule issued or approved under Title V.

# II. FACTUAL BACKGROUND

9. AK Steel owns and operates an integrated steel-producing facility located at 1801 Crawford Street, Middletown, Ohio ("facility").

10. At its Middletown facility, AK Steel owns and operates, among other emission sources, a coke oven battery known as the Wilputte Battery, or, alternatively, as emissions unit B918 ("Wilputte Battery"). The Wilputte Battery produces metallurgical coke.

11. The Wilputte Battery is a short by-product coke oven battery, because its ovens are less than six meters (20 feet) in height.

12. On November 1, 2004, Ohio Environmental Protection Agency issued a Title V operating permit, Facility I.D. # 14-09-01-0006 ("Title V Permit"), to AK Steel.

13. On September 13, 2011, EPA issued a Section 114 information request to AK Steel to use the continuous opacity monitoring system (COMS) installed at the Wilputte Battery combustion stack to monitor, record, and maintain the six-minute average opacity of emissions exiting the combustion stack for a period of 90 days. AK Steel responded to EPA's request by submitting emissions data detailing six-minute average opacities measured at the combustion stack over a

period of 99 days, beginning on October 1, 2011 and ending on January 8, 2012. These data were submitted on the following dates: November 18, 2011, December 20, 2011, and January 20, 2012.

14. For the period October 1, 2011 to January 8, 2012, AK Steel reported 595 exceedances of the twenty percent opacity limit, as a six-minute average, exiting the combustion stack at the Wilputte Battery. *See Attachment A.*

## III. VIOLATIONS

15. AK Steel violated and continues to violate OAC Chapter 3745-17-07(A)(1) and Part III.A.I.1 of its Title V Permit for the Wilputte Battery by exceeding the twenty percent, as a six-minute average, visible particulate matter emissions limit from its Wilputte Battery combustion stack. AK Steel's violation of its Title V Permit violates Title V of the Act and 40 C.F.R. Part 70.

## IV. ENVIRONMENTAL IMPACT OF VIOLATIONS

16. Violation of opacity standards is indicative of mass emission standards violations. Such violations increase public exposure to, amongst other pollutants, unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths.

6/28/12
Date

George T. Czerniak
Acting Director
Air and Radiation Division

Attachment A: Wilputte Battery combustion stack 6-minute average opacity exceedances, measured during the period October 10, 2011, to January 8, 2012.

| | Date | Time | Opacity % |
|---|---|---|---|
| 1 | 10/11/2011 | 1:54 | 33.6 |
| 2 | | 13:42 | 21.3 |
| 3 | | 23:36 | 23.7 |
| 4 | 10/12/2011 | 14:42 | 28.6 |
| 5 | | 14:48 | 25.3 |
| 6 | | 16:54 | 28.3 |
| 7 | 10/13/2011 | 4:54 | 20.3 |
| 8 | | 14:54 | 25.3 |
| 9 | 10/14/2011 | 16:48 | 21.1 |
| 10 | 10/15/2011 | 1:54 | 22.5 |
| 11 | | 13:54 | 33 |
| 12 | | 14:06 | 19.7 |
| 13 | | 14:12 | 23.7 |
| 14 | | 17:36 | 32.7 |
| 15 | 10/16/2011 | 6:36 | 40.8 |
| 16 | | 15:42 | 28.1 |
| 17 | | 17:48 | 20.1 |
| 18 | | 17:54 | 20.7 |
| 19 | 10/17/2011 | 12:00 | 26.2 |
| 20 | | 12:36 | 29.4 |
| 21 | | 12:42 | 24.4 |
| 22 | | 12:48 | 23.2 |
| 23 | | 14:54 | 21.9 |
| 24 | | 16:42 | 24.7 |
| 25 | 10/18/2011 | 1:30 | 32.5 |
| 26 | | 12:42 | 31.6 |
| 27 | | 16:54 | 29.2 |
| 28 | 10/19/2011 | 4:12 | 30.1 |
| 29 | | 8:00 | 41.6 |
| 30 | | 13:36 | 29.3 |
| 31 | | 17:54 | 21.5 |
| 32 | 10/21/2011 | 1:42 | 20.4 |
| 33 | | 16:42 | 51.8 |
| 34 | | 16:48 | 33.2 |
| 35 | | 16:54 | 21.2 |
| 36 | 10/22/2011 | 0:06 | 23.5 |
| 37 | | 3:48 | 20.1 |
| 38 | | 4:36 | 22.9 |

| | | | |
|---|---|---|---|
| 39 | | 6:36 | 20.7 |
| 40 | | 6:42 | 22.4 |
| 41 | 10/23/2011 | 17:48 | 22.3 |
| 42 | 10/24/2011 | 1:00 | 21.1 |
| 43 | | 23:48 | 25.4 |
| 44 | 10/25/2011 | 1:24 | 24.4 |
| 45 | | 11:36 | 24 |
| 46 | | 11:48 | 31.6 |
| 47 | 10/26/2011 | 2:48 | 47.4 |
| 48 | | 2:54 | 23.9 |
| 49 | | 4:30 | 42.5 |
| 50 | | 4:36 | 55.2 |
| 51 | | 4:42 | 40.5 |
| 52 | | 4:48 | 23.9 |
| 53 | | 4:54 | 20.6 |
| 54 | | 17:00 | 20.9 |
| 55 | | 17:42 | 23.8 |
| 56 | | 19:48 | 20.9 |
| 57 | | 19:54 | 23.5 |
| 58 | | 20:54 | 21.5 |
| 59 | | 22:00 | 21.9 |
| 60 | | 23:36 | 32.7 |
| 61 | | 23:42 | 30.8 |
| 62 | | 23:54 | 21.1 |
| 63 | 10/27/2011 | 4:54 | 20.7 |
| 64 | | 5:12 | 30.3 |
| 65 | | 5:18 | 38.5 |
| 66 | | 5:24 | 44.8 |
| 67 | | 5:48 | 24.6 |
| 68 | | 5:54 | 27.5 |
| 69 | | 6:36 | 20.5 |
| 70 | | 6:48 | 21.3 |
| 71 | | 6:54 | 20.4 |
| 72 | | 7:00 | 20.2 |
| 73 | | 12:54 | 33.2 |
| 74 | | 13:00 | 21.9 |
| 75 | | 13:42 | 32.1 |
| 76 | | 13:48 | 21.1 |
| 77 | | 14:54 | 22.6 |
| 78 | | 15:30 | 34 |
| 79 | 10/28/2011 | 4:42 | 20.1 |

| | | | |
|---|---|---|---|
| 80 | 10/29/2011 | 1:54 | 21.5 |
| 81 | | 4:18 | 46.3 |
| 82 | | 4:24 | 21.1 |
| 83 | | 4:36 | 24.5 |
| 84 | | 5:36 | 24 |
| 85 | | 12:42 | 22.1 |
| 86 | | 15:54 | 22.8 |
| 87 | | 16:48 | 20.4 |
| 88 | | 18:42 | 28.1 |
| 89 | | 18:48 | 25.4 |
| 90 | | 18:54 | 21.9 |
| 91 | | 23:54 | 22 |
| 92 | 10/30/2011 | 2:48 | 21.2 |
| 93 | | 11:54 | 24.6 |
| 94 | | 17:42 | 22.4 |
| 95 | | 17:48 | 20.6 |
| 96 | | 18:48 | 20.1 |
| 97 | | 18:54 | 21.8 |
| 98 | | 19:54 | 22.4 |
| 99 | | 20:48 | 20.4 |
| 100 | | 20:54 | 22.3 |
| 101 | | 21:48 | 20.1 |
| 102 | | 21:54 | 22 |
| 103 | | 22:36 | 43.3 |
| 104 | | 22:42 | 53.2 |
| 105 | | 22:48 | 29.6 |
| 106 | | 22:54 | 22 |
| 107 | | 23:54 | 22.1 |
| 108 | 10/31/2011 | 2:54 | 20.4 |
| 109 | | 3:54 | 33 |
| 110 | | 4:18 | 20.9 |
| 111 | | 4:36 | 21.1 |
| 112 | | 9:48 | 23.9 |
| 113 | | 9:54 | 36.7 |
| 114 | | 10:00 | 24.3 |
| 115 | | 12:54 | 21.2 |
| 116 | | 13:54 | 20.3 |
| 117 | | 15:36 | 21.9 |
| 118 | | 15:42 | 23.2 |
| 119 | | 15:48 | 23.9 |
| 120 | | 15:54 | 26.3 |

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|---|---|---|---|
| 121 | | 16:48 | 26.1 |
| 122 | | 16:54 | 21.6 |
| 123 | | 17:54 | 20.6 |
| 124 | | 18:36 | 23 |
| 125 | | 18:54 | 21.2 |
| 126 | 11/1/2011 | 0:54 | 36.1 |
| 127 | | 9:54 | 21.9 |
| 128 | | 10:54 | 20.1 |
| 129 | | 12:36 | 30.8 |
| 130 | | 12:48 | 20.8 |
| 131 | | 12:54 | 20.1 |
| 132 | | 13:06 | 28.1 |
| 133 | | 13:12 | 23.6 |
| 134 | | 13:36 | 32.2 |
| 135 | | 13:42 | 30 |
| 136 | | 13:48 | 36.1 |
| 137 | | 13:54 | 33.7 |
| 138 | | 14:42 | 20.3 |
| 139 | | 14:48 | 22 |
| 140 | | 14:54 | 23.7 |
| 141 | | 15:48 | 21.7 |
| 142 | | 15:54 | 23.8 |
| 143 | | 16:54 | 21.7 |
| 144 | | 17:42 | 25.5 |
| 145 | | 17:48 | 22.6 |
| 146 | | 17:54 | 29.3 |
| 147 | | 18:00 | 24.8 |
| 148 | | 18:42 | 23.3 |
| 149 | | 18:48 | 21.2 |
| 150 | | 19:54 | 21.2 |
| 151 | | 20:54 | 21.3 |
| 152 | | 21:54 | 21 |
| 153 | 11/2/2011 | 11:54 | 30.9 |
| 154 | | 12:18 | 32.9 |
| 155 | | 12:24 | 30.2 |
| 156 | | 12:36 | 33.7 |
| 157 | | 12:48 | 24.8 |
| 158 | | 12:54 | 24 |
| 159 | | 13:36 | 22.7 |
| 160 | | 13:42 | 25.1 |
| 161 | | 13:48 | 21.4 |

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| 162 | | 13:54 | 20.2 |
| 163 | | 16:54 | 20.1 |
| 164 | 11/3/2011 | 5:48 | 33.2 |
| 165 | | 11:48 | 21.1 |
| 166 | | 12:48 | 22.2 |
| 167 | | 13:42 | 34.1 |
| 168 | | 14:06 | 23.8 |
| 169 | | 23:36 | 37.9 |
| 170 | | 23:42 | 21.9 |
| 171 | 11/4/2011 | 13:42 | 29.2 |
| 172 | | 14:36 | 23.5 |
| 173 | 11/5/2011 | 4:12 | 31.2 |
| 174 | | 4:18 | 23.5 |
| 175 | | 12:48 | 21.7 |
| 176 | | 14:48 | 20.9 |
| 177 | 11/6/2011 | 11:36 | 20.2 |
| 178 | | 22:12 | 48.9 |
| 179 | 11/7/2011 | 12:54 | 36.8 |
| 180 | | 16:48 | 24.4 |
| 181 | 11/8/2011 | 6:24 | 21.4 |
| 182 | | 12:06 | 25.7 |
| 183 | | 12:12 | 64.9 |
| 184 | | 12:18 | 89.3 |
| 185 | | 20:36 | 31.8 |
| 186 | 11/9/2011 | 0:18 | 24.7 |
| 187 | | 0:24 | 35.5 |
| 188 | | 6:18 | 52.3 |
| 189 | | 18:18 | 23.5 |
| 190 | | 20:36 | 26.3 |
| 191 | | 21:36 | 25.2 |
| 192 | 11/10/2011 | 0:00 | 26.4 |
| 193 | | 2:30 | 34.9 |
| 194 | | 2:36 | 21.3 |
| 195 | | 2:42 | 21.7 |
| 196 | | 7:12 | 22.6 |
| 197 | | 7:18 | 20.7 |
| 198 | | 7:24 | 22.6 |
| 199 | | 12:18 | 33.7 |
| 200 | | 18:36 | 23.5 |
| 201 | 11/12/2011 | 4:36 | 29.4 |
| 202 | | 7:48 | 21.8 |

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| 203 | 11/13/2011 | 4:54 | 31.4 |
| 204 | | 5:42 | 26.9 |
| 205 | 11/14/2011 | 3:54 | 21.5 |
| 206 | 11/15/2011 | 0:06 | 23 |
| 207 | 11/16/2011 | 12:54 | 24.6 |
| 208 | 11/17/2011 | 6:18 | 20.5 |
| 209 | | 6:24 | 31.9 |
| 210 | | 7:06 | 21.7 |
| 211 | | 7:12 | 28.6 |
| 212 | 11/18/2011 | 0:06 | 24.1 |
| 213 | | 14:36 | 21.3 |
| 214 | 11/19/2011 | 0:36 | 22.5 |
| 215 | | 15:54 | 26.6 |
| 216 | 11/20/2011 | 2:48 | 32.7 |
| 217 | 11/21/2011 | 12:48 | 43.1 |
| 218 | 11/22/2011 | 14:42 | 21.9 |
| 219 | | 17:54 | 24.8 |
| 220 | | 18:00 | 24.6 |
| 221 | 11/23/2011 | 2:42 | 21.4 |
| 222 | | 12:42 | 49.3 |
| 223 | | 12:48 | 30 |
| 224 | 11/25/2011 | 12:54 | 22.8 |
| 225 | | 17:48 | 26.8 |
| 226 | | 17:54 | 22.9 |
| 227 | 11/27/2011 | 12:48 | 29.4 |
| 228 | 11/29/2011 | 22:18 | 39.4 |
| 229 | | 22:24 | 45.3 |
| 230 | | 22:30 | 68.2 |
| 231 | | 22:36 | 61.7 |
| 232 | | 22:42 | 33.7 |
| 233 | | 22:48 | 25.9 |
| 234 | | 22:54 | 26.7 |
| 235 | 11/30/2011 | 9:42 | 39.5 |
| 236 | | 13:36 | 27.8 |
| 237 | 12/1/2011 | 6:48 | 20.1 |
| 238 | | 18:36 | 21.2 |
| 239 | 12/2/2011 | 11:42 | 22.3 |
| 240 | | 19:36 | 24.8 |
| 241 | 12/3/2011 | 10:18 | 20.2 |
| 242 | | 16:12 | 37.9 |
| 243 | 12/4/2011 | 15:18 | 21.2 |

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|---|---|---|---|
| 244 | | 15:24 | 21.5 |
| 245 | 12/5/2011 | 8:54 | 21.9 |
| 246 | | 9:00 | 23.6 |
| 247 | | 12:12 | 27.1 |
| 248 | | 16:54 | 30.3 |
| 249 | | 18:48 | 22 |
| 250 | | 18:54 | 26.8 |
| 251 | | 19:12 | 21.6 |
| 252 | | 19:18 | 25.2 |
| 253 | | 19:42 | 30.6 |
| 254 | 12/6/2011 | 11:24 | 20.8 |
| 255 | | 18:36 | 27 |
| 256 | | 18:42 | 30.8 |
| 257 | 12/7/2011 | 1:48 | 26.1 |
| 258 | | 1:54 | 21.7 |
| 259 | | 4:36 | 28.2 |
| 260 | | 6:36 | 20.9 |
| 261 | | 18:42 | 24.3 |
| 262 | | 19:06 | 23.5 |
| 263 | | 19:12 | 20.4 |
| 264 | | 19:18 | 22 |
| 265 | 12/8/2011 | 3:36 | 23.3 |
| 266 | | 3:42 | 21.2 |
| 267 | | 3:48 | 20.7 |
| 268 | | 4:42 | 21.8 |
| 269 | | 4:48 | 25.6 |
| 270 | | 5:36 | 20.2 |
| 271 | | 12:24 | 53.9 |
| 272 | | 12:30 | 46.6 |
| 273 | | 12:48 | 21.9 |
| 274 | | 18:36 | 26.1 |
| 275 | | 13:42 | 31.6 |
| 276 | 12/9/2011 | 4:36 | 25.6 |
| 277 | | 4:42 | 20.1 |
| 278 | | 5:36 | 30.7 |
| 279 | | 5:42 | 21.4 |
| 280 | | 12:18 | 30.8 |
| 281 | | 16:36 | 23.9 |
| 282 | | 16:42 | 48.3 |
| 283 | | 16:48 | 33.3 |
| 284 | | 23:54 | 22.5 |

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|---|---|---|---|
| 285 | 12/10/2011 | 0:24 | 32.4 |
| 286 | | 4:36 | 21.5 |
| 287 | | 4:42 | 23.5 |
| 288 | | 4:48 | 20.7 |
| 289 | | 4:54 | 24.8 |
| 290 | | 7:24 | 20.4 |
| 291 | 12/11/2011 | 12:36 | 33.8 |
| 292 | | 12:42 | 20.5 |
| 293 | 12/12/2011 | 8:12 | 20.7 |
| 294 | | 16:24 | 30.9 |
| 295 | | 23:42 | 24.5 |
| 296 | | 23:48 | 21.6 |
| 297 | 12/13/2011 | 4:18 | 20.3 |
| 298 | | 8:30 | 31.2 |
| 299 | | 8:42 | 30.2 |
| 300 | | 8:48 | 63.7 |
| 301 | | 8:54 | 45.8 |
| 302 | | 17:24 | 22.5 |
| 303 | 12/14/2011 | 4:36 | 21.1 |
| 304 | | 18:24 | 25.7 |
| 305 | 12/15/2011 | 5:36 | 23 |
| 306 | | 19:06 | 31.4 |
| 307 | | 19:12 | 33.9 |
| 308 | | 19:18 | 37.3 |
| 309 | | 19:24 | 37.8 |
| 310 | | 19:30 | 22.7 |
| 311 | | 20:06 | 20.1 |
| 312 | 12/16/2011 | 13:18 | 36.3 |
| 313 | | 13:24 | 36.2 |
| 314 | | 13:36 | 22.4 |
| 315 | | 13:42 | 24.2 |
| 316 | | 14:36 | 25 |
| 317 | 12/17/2011 | 2:36 | 25 |
| 318 | | 19:18 | 20.8 |
| 319 | | 19:24 | 22.2 |
| 320 | 12/18/2011 | 8:48 | 27.1 |
| 321 | 12/19/2011 | 22:54 | 32.8 |
| 322 | | 23:00 | 43.5 |

| | | | |
|---|---|---|---|
| 323 | | 23:06 | 48.9 |
| 324 | | 23:12 | 47.1 |
| 325 | | 23:18 | 54.3 |
| 326 | | 23:24 | 48.7 |
| 327 | | 23:30 | 33.4 |
| 328 | 12/20/2011 | 5:06 | 26.2 |
| 329 | | 6:00 | 20.9 |
| 330 | | 6:06 | 27.2 |
| 331 | | 6:24 | 24.4 |
| 332 | | 6:30 | 24.4 |
| 333 | | 6:36 | 34.8 |
| 334 | | 6:42 | 38.3 |
| 335 | | 6:48 | 50 |
| 336 | | 6:54 | 46.8 |
| 337 | | 23:06 | 22.6 |
| 338 | | 23:12 | 26.3 |
| 339 | | 23:18 | 30.9 |
| 340 | 12/21/2011 | 1:24 | 24.1 |
| 341 | | 3:06 | 21.6 |
| 342 | | 3:12 | 21.9 |
| 343 | | 7:18 | 22.2 |
| 344 | | 7:24 | 23.1 |
| 345 | | 7:30 | 20.4 |
| 346 | | 21:06 | 23 |
| 347 | | 21:12 | 25.3 |
| 348 | | 21:18 | 23.8 |
| 349 | 12/22/2011 | 2:06 | 26.7 |
| 350 | | 10:12 | 22.2 |
| 351 | | 10:18 | 30.6 |
| 352 | | 21:36 | 23 |
| 353 | | 22:24 | 24.5 |
| 354 | | 22:54 | 22 |
| 355 | | 23:06 | 27.8 |
| 356 | | 23:12 | 42.1 |
| 357 | | 23:18 | 35.7 |
| 358 | | 23:24 | 27.9 |
| 359 | 12/23/2011 | 18:12 | 22.6 |
| 360 | | 18:18 | 24.1 |

| | | | |
|---|---|---|---|
| 361 | | 18:24 | 40.8 |
| 362 | | 19:12 | 21 |
| 363 | | 19:18 | 23.8 |
| 364 | 12/24/2011 | 1:24 | 29.5 |
| 365 | | 3:24 | 24 |
| 366 | | 7:24 | 25 |
| 367 | | 11:12 | 30.2 |
| 368 | | 11:18 | 42.1 |
| 369 | | 11:24 | 44.2 |
| 370 | | 11:30 | 23.5 |
| 371 | | 17:18 | 21 |
| 372 | 12/25/2011 | 6:12 | 23.4 |
| 373 | | 9:30 | 22.6 |
| 374 | | 11:18 | 23.8 |
| 375 | | 11:24 | 22.6 |
| 376 | | 17:18 | 22.9 |
| 377 | | 17:24 | 23.5 |
| 378 | | 20:48 | 20.5 |
| 379 | | 21:36 | 20.7 |
| 380 | | 21:42 | 24 |
| 381 | | 21:48 | 26.3 |
| 382 | | 22:42 | 20.1 |
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| 384 | | 1:48 | 23.7 |
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| 387 | | 10:00 | 25.9 |
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| 390 | | 12:42 | 22.8 |
| 391 | | 13:18 | 24.6 |
| 392 | | 13:24 | 25.2 |
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| 394 | | 14:18 | 23.2 |
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| 397 | | 16:42 | 24.6 |
| 398 | | 21:36 | 22.6 |

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| 421 | | 1:54 | 25.5 |
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| 427 | | 13:42 | 20.1 |
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| 429 | | 23:24 | 20.1 |
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| 436 | 12/30/2011 | 6:36 | 22.4 |

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| 452 | | 20:48 | 22 |
| 453 | | 20:54 | 21.4 |
| 454 | | 22:54 | 23.6 |
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| 458 | | 8:18 | 22.6 |
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| 463 | | 20:42 | 21.5 |
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| 467 | 1/1/2012 | 8:24 | 40.7 |
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| 471 | | 20:54 | 20.8 |
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| 474 | | 8:36 | 24.3 |

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| 476 | | 8:48 | 26 |
| 477 | | 11:00 | 30.7 |
| 478 | | 12:30 | 28.2 |
| 479 | | 12:36 | 24.2 |
| 480 | | 12:42 | 24.2 |
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| 482 | | 16:54 | 25.6 |
| 483 | 1/3/2012 | 6:36 | 30.3 |
| 484 | | 6:54 | 22.6 |
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| 487 | | 10:54 | 20.7 |
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| 493 | | 7:54 | 28.7 |
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| 496 | | 12:06 | 53.2 |
| 497 | | 15:54 | 27.4 |
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| 499 | | 20:54 | 42 |
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| 523 | 1/6/2012 | 0:36 | 26.6 |
| 524 | | 0:42 | 32.8 |
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| 539 | | 10:24 | 30.5 |
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| 545 | | 14:54 | 28.6 |
| 546 | | 15:54 | 25.3 |
| 547 | | 18:54 | 31.1 |
| 548 | | 19:36 | 20.8 |
| 549 | | 19:42 | 25.5 |
| 550 | | 20:36 | 28 |

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|---|---|---|---|
| 551 | | 22:48 | 20.2 |
| 552 | 1/7/2012 | 0:36 | 21.6 |
| 553 | | 0:42 | 23.5 |
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| 562 | | 4:48 | 42.9 |
| 563 | | 4:54 | 39.8 |
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| 566 | | 6:00 | 36.1 |
| 567 | | 6:36 | 24.3 |
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| 569 | | 6:54 | 23.4 |
| 570 | | 8:36 | 20.7 |
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| 572 | | 10:00 | 27.2 |
| 573 | | 11:48 | 20.4 |
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| 577 | | 13:48 | 24.7 |
| 578 | | 14:30 | 26.2 |
| 579 | | 14:36 | 28.2 |
| 580 | | 14:42 | 31.1 |
| 581 | | 14:48 | 31.7 |
| 582 | | 14:54 | 24.4 |
| 583 | | 18:54 | 21.2 |
| 584 | | 20:42 | 20.5 |
| 585 | | 21:36 | 22.5 |
| 586 | | 21:42 | 20.6 |
| 587 | | 22:36 | 33.5 |
| 588 | | 22:42 | 35.5 |

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| 590 | | 22:54 | 28.5 |
| 591 | 1/8/2012 | 12:18 | 20.7 |
| 592 | | 16:36 | 28.3 |
| 593 | | 16:42 | 43.1 |
| 594 | | 16:48 | 34.4 |
| 595 | | 16:54 | 25.7 |

**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violations, Docket Number EPA-5-12-OH-18, by Certified Mail, Return Receipt Requested, to:

Pat Gallo
Environmental Manager
AK Steel Corporation, Middletown Works
1801 Crawford Street
Middletown, Ohio 45043

I also certify that I sent a copy of the Notice and Finding of Violations, Docket Number EPA-5-12-OH-18, by First Class Mail to:

Brad Miller
Hamilton County Department of Environmental Services
Air Quality Programs
250 William Howard Taft Road
Cincinnati, OH 45219

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43138

on the 29 day of June 2012.

Loretta Shaffer

Loretta Shaffer
Administrative Program Assistant
AECAB/AECAS/PAS

Certified Mail Receipt Number: 7009 1680 0000 7672 9604