Message

From: Dickens, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=416CD582A67D44AAB91D3BEFF56B892D-BDICKENS]
Sent: 6/14/2018 8:41:14 PM
To: James.Kavalec@epa.ohio.gov
CC: Breneman, Sara [breneman.sara@epa.gov]; Harrison, Gina [harrison.gina@epa.gov]; St. Peter, Marie [StPeter.Marie@epa.gov]
Subject: AK Steel

Jim:

We were planning to send an NOV to AK Steel for the following violations:

OAC rule 3745-17-07(B)(2)(b) limits VEs from "offtake piping." No more than 10% of offtake piping should be leaking at any time.
OAC rule 3745-17-07(B)(2)(d)(ii) limits VEs from ovens. No more than 10% of ovens should be leaking at any time.
OAC rule 3745-17-07(B)(2)(a) limits VEs from charging. VEs from charging shall not exceed 125 seconds during any 5 consecutive charges.

I think your NOV only contained the second rule.

We would seek to require that AK ensure compliance with the charging limit and the 10% rule for offtake piping, similar to your order's requirement that AK comply with the 10% rule for oven door leaks. Do you want to expand your case to include these, or want us to send our NOV?

(please copy Sara on your reply)

Thanks

Brian Dickens, Chief
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