Message

From: Dickens, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=416CD582A67D44AAB91D3BEFF56B892D-BDICKENS]
Sent: 7/9/2018 3:13:14 PM
To: Harrison, Gina [harrison.gina@epa.gov]; St. Peter, Marie [StPeter.Marie@epa.gov]
Subject: FW: AK Steel
Attachments: ATT00001.txt

I'm not comfortable with us not sending an NOV. Maybe we send an NOV and then say in the NOV cover letter that we know AK is talking with Ohio, so an NOV conference is optional and up to AK.
I suppose check with ORC. Please let me know what you all (and ORC) think,

---

From: James.Kavalec@epa.ohio.gov [mailto:James.Kavalec@epa.ohio.gov]
Sent: Monday, July 09, 2018 9:53 AM
To: Dickens, Brian <dickens.brian@epa.gov>
Subject: RE: AK Steel

These were already mentioned and address in the Order so an NOV seems unnecessary

---

From: Dickens, Brian <dickens.brian@epa.gov>
Sent: Monday, July 9, 2018 10:20 AM
To: Kavalec, James <James.Kavalec@epa.ohio.gov>
Subject: RE: AK Steel

I left you a voicemail. We think it is important to tell the company about these offtake and charging violations. We can send an NOV, and then, I suppose, talk to them in the NOV conference. Is that what you were thinking?

From: James.Kavalec@epa.ohio.gov [mailto:James.Kavalec@epa.ohio.gov]
Sent: Monday, July 09, 2018 9:12 AM
To: Dickens, Brian <dickens.brian@epa.gov>
Cc: Harrison, Gina <harrison.gina@epa.gov>; St. Peter, Marie <StPeter.Marie@epa.gov>
Subject: RE: AK Steel

We did not take VE readings so we would not issue an NOV

From: Dickens, Brian <dickens.brian@epa.gov>
Sent: Thursday, July 5, 2018 12:07 PM
To: Kavalec, James <James.Kavalec@epa.ohio.gov>
Cc: Harrison, Gina <harrison.gina@epa.gov>; St. Peter, Marie <StPeter.Marie@epa.gov>
Subject: RE: AK Steel

Jim:

I understand Bob and my Division Director talked about AK Steel on the Annual Planning call that happened two weeks ago, but I don't have a clear understanding of what was decided with respect to my email below.
Do you plan to issue an NOV for the offtake piping and charging violations?

Brian

From: Dickens, Brian
Sent: Thursday, June 14, 2018 3:41 PM
To: 'James.Kavalec@epa.ohio.gov' <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
Air Enforcement and Compliance Assurance Section
U.S. Environmental Protection Agency
Chicago, Illinois
Ph: 312-886-6073

Did You Know: Children of parents who talk to their teens about drugs are up to 50% less likely to use. Start the conversation: StartTalking.Ohio.Gov

This email is intended for the sole use of the intended recipient and may contain privileged, sensitive or protected information. If you are not the intended recipient, be advised that the unauthorized use, disclosure, copying, distribution, or action taken in reliance on the contents of this communication is prohibited. If you have received this email in error, please notify the sender via telephone or return email and immediately delete this email.