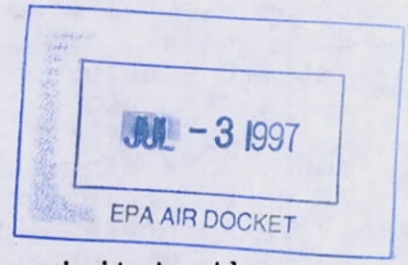


9/2/92

Docket No. A-95-43
Item No. II-C-12

Mr. Larry Kilgore
Plant Manager
Valley City Steel
804 Steel Drive
Valley City, Ohio 44280



Dear Mr. Kilgore:

Thank you for your efforts in coordinating a visit to the Valley City Steel facility in Valley City, Ohio, on May 5, 1992. We appreciate the time that you spent with us to discuss the acid pickling and the acid regeneration processes and to inspect your facility.

Enclosed is a draft of the trip report that has been prepared based on the information obtained during our site visit. We would appreciate your reviewing the report for any errors or omissions. You may return the enclosed copy of the report with your written comments. Since this report will eventually become a part of the public record, we want to portray your operations as accurately as possible.

If you believe that disclosure of any specific information contained in the trip report would reveal trade secrets or other confidential information, you should clearly identify the specific information. Please do not label the entire report "confidential" if only certain portions consist of trade secret information. If the EPA determines that there is a need to disclose such information, we will need, at that time, the following to support your claim:

1. Measures taken by Valley City Steel to guard against undesired disclosure of the specific information to others;
2. The extent to which the specific information has been disclosed to others and the precautions taken in connection therewith;
3. Pertinent confidentiality determinations, if any, by other Federal agencies (furnish a copy of any such determination or reference to it, if available); and

4. Whether Valley City Steel asserts that disclosure of the specific information would be likely to result in substantial harmful effects on its competitive position, and, if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

Any specific information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice (40 CFR Part 2.203, September 1, 1976). All emission data, however, will be available to the public. A clarification of what EPA considers to be emission data is contained in Enclosure 2.

We respectfully request that you submit your review comments on the trip report by October 16, 1992. If you concur with the information contained in the report and if no confidential information is contained in the report, we would appreciate a letter to that effect. If we do not hear from you by October 16, 1992, EPA will consider the report nonconfidential, complete, correct, and final.

Thank you for your cooperation. The information supplied by Valley City Steel will be most helpful in our study. If you have any questions, please call Mr. James Maysilles of EPA at (919) 541-3265.

Sincerely,

James U. Crowder, Chief
Industrial Studies Branch
Emission Standards Division

2 Enclosures

OAQPS/ISB:JMaysilles:MD-13:RTP,NC:(FTS)541-3265
(RTI/EKong:ECorbett/(919)990-8623:09-02-92)