

**Environmental
Protection Agency**

Ohio
Governor
Lt. Governor
Director

October 31, 2011

CERTIFIED MAIL

Mr. Pete Kefalas, Plant Manager
Bull Moose Tube Company
1433 Standard Ave. S.E.
Masury, OH 44438

**RE: Certified Warning Letter for Record Keeping Violations; DAPC Facility ID:
0278000766**

Dear Mr. Emery:

On October 26, 2011, an inspection of Bull Moose Tube Company (Bull Moose) was conducted to determine compliance with the facility's air pollution permits and with Ohio's air pollution control laws. The inspection was performed in order to resolve some issues with the Permit-to-Install/Operate (PTIO) renewal application received June 16, 2011. The purpose of this letter is to provide a written follow-up to the inspection.

During the visit we discussed the renewal application and permit issues, reviewed records, and performed a walkthrough of the facility. Based upon the inspection, the following issues need to be addressed:

1. As discussed, per Part II, Section C.1 of the Permits-to-Operate (PTOs) for K002 and K003, Bull Moose should be recording the following daily:
 - a. The name and identification number of each coating, thinner, and cleanup material employed;
 - b. The VOC content of each coating, thinner, and cleanup material (excluding water and exempt solvents), in pounds, as applied;
 - c. The volume of each coating, thinner, and cleanup material employed, in gallons; and
 - d. The total VOC emissions from all coating, thinner, and cleanup material employed, in pounds, i.e., the sum of (b) times (c).

The records currently being kept include the monthly usage of rust preventative and the number of days of application for each month. A daily average for VOC emissions is then calculated. There are no daily records for the amount of rust preventative used.

Bull Moose shall submit to this office average daily usage records dating back from October 1, 2011 through to October 31, 2011, and beginning November 1, 2011, shall start keeping daily records for the amount of rust preventative applied and the resultant daily VOC emissions.

2. The Permits-to-Install (PTIs) for emissions units K002, K003, and K004 included a "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") based on the original coating (for K004) and rust preventative (for K002 and K003) used. Since the issuance of the PTIs, the coating and rust preventative used has changed. Per Part II, Section C.2, any changes in the composition of materials used or use of new materials requires an evaluation to be conducted to determine that the "Air Toxic Policy" will still be satisfied.

Bull Moose shall conduct an evaluation for the current coating and rust preventative being used and submit it to this office.

3. As part of the technical review of the renewal application, the following information is needed in order to continue processing:
 - a. The requested allowables for VOC emissions cannot be greater than the emission limitation in the current permit unless a modification is being requested. Please correct this for all emissions units.
 - b. The actual emission information was calculated using the emission limitations in the current permit. The actual emissions must be calculated using actual usage records from Bull Moose.
 - c. The maximum coating usage rates listed on the Emissions Activity Category (EAC) forms were calculated using the emission limitations in the current permit. The maximum coating usage rates should be determined from actual usage records from Bull Moose.

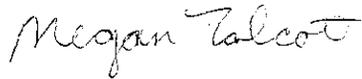
In summary, the record keeping for emissions units K002 and K003 needs to be revised to include daily usage of rust preventative. The average daily use for the timeframe referenced above must be submitted along with an "Air Toxic Policy" evaluation based on the current coating and rust preventative. Please also submit the requested information for the renewal application. Please submit this information by Wednesday, November 23, 2011.

The submission of the above information does not constitute a waiver of Ohio EPA's authority to seek civil penalties, as provided in Section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date. This notice does not excuse any violations of federal, state and local laws or regulations regarding air pollution control. Failure to respond within the specified time frame can result in further enforcement action.

PETE KEFALAS
OCTOBER 31, 2011
PAGE 3

Thank you for the time and courtesy extended during the inspection. If you have any questions regarding this letter, please contact me at (330) 963-1152.

Sincerely,



Megan L. Talcott
Environmental Specialist
Division of Air Pollution Control

MLT:bo

enclosure

pc: Misty Koletich, Ohio EPA, DAPC, NEDO
Tim Fischer, Ohio EPA, DAPC, NEDO