



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Auglaize County
0306020008
G. A. Wintzer & Son
Stack Test HPV-GC8
Notice of Violation

June 29, 2009

CERTIFIED MAIL

G. A. Wintzer & Son Company
P O Box 406
5 North Blackhoof Street
Wapakoneta, Ohio 45895

Dear Mr. Wintzer:

The stack test conducted on February 26, 2009, on Ohio EPA emissions unit No. B003, has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

**Critical Test Data
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
PM ₁₀	0.176 lb/MMBtu	0.05 lb/MMBtu	77.88 MMBtu/hr	87.5 MMBtu/hr
NO _x	0.15 lb/MMBtu	0.23 lbs/MMBtu*	77.88 MMBtu/hr	87.5 MMBtu/hr

* This emissions limit appears in Section A.V.2.b.ii of the permit for this emissions unit.

Our review of the stack test shows that the addition of the condensible PM (0.133 lb/MMBtu) to the filterable PM (0.043 lb/MMBtu) results in a violation of the mass emission rate limit (0.05 lb/MMBtu) for PM-10. The permit for this emissions unit requires that both be quantified and included in the PM-10 compliance determination. However, in May of 2008, USEPA issued a moratorium on the inclusion of condensible PM in the establishment of enforceable emissions limits in new permitting actions due to problems with Method 202. This moratorium will end on January 1, 2011, or with USEPA's promulgation of a valid test method, whichever occurs first.

Although this emissions unit is being operated in violation of the PM-10 emission limit in the permit, USEPA's action raises concerns on the validity of the results obtained utilizing Method 202. Because of this, Ohio EPA will exercise enforcement discretion on this matter until a valid test method is promulgated. At that time, the permit will be modified to require the use of the new method and a compliance test will immediately be required.



G.A. Wintzer & Son Company
June 29, 2009
Page Two

In the interim, we recommend that G.A. Wintzer thoroughly evaluate its compliance options in view of the fact that the measured condensible emission rate was over three times that of the filterable rate. Although Method 202 is suspected of biasing results "slightly high", there is very little room for any condensible PM emissions based on the current permit limit proposed by the company. The company will need to either significantly reduce these emissions or request and obtain a permit modification to increase the PM-10 limit before the moratorium ends.

The test report was submitted to our office on May 1, 2009, almost nine weeks after the February 26 test date. This submission followed discussions between our office and the company regarding an Intent-to-Test (ITT) received by our office on April 26 for a re-test of this unit. In the test report cover letter, the company cites its low firing rate and a failure of the fuel tank mixing mechanism used to achieve a compliant sulfur content. The company believes the failure of the mixing system may have resulted in firing more of the heavier, non-compliant No. 6 fuel oil although the mass balance calculations of the tank's oil sulfur content did not.

It is for these reasons that the company simply assumed a re-test would be required and submitted a new ITT. It also assumed the submission of the original report would not be needed. Section A.V.2.e of the Permit to Install (PTI) for this emissions unit requires that, when a test is conducted, the test report is due within 30 days after the test date. Failure to do so is a violation of the PTI and Ohio Revised Code 3704.05.

The company must provide a written response regarding any preliminary intentions to resolve the PM10 compliance issues discussed in this letter. Please respond by no later than July 31, 2009. Please also include the company's response to Todd Brown's email of May 11 regarding information needed to approve the certification of the COMS.

Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

You may contact me at (419) 373 -3117, should you have any questions or comments regarding this letter. I may also be contacted electronically by E-mail at: paul.chad@epa.state.oh.us

Sincerely,



Paul Chad
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC-NWDO
Robert Teer, DAPC-NWDO
Tom Sattler, DAPC-NWDO
Tom Kalman, DAPC-CO
Lisa Holscher, US EPA

~~DAPC-NWDO file~~

Stack File

Follow-up File

7007 2560 0000 4485 6642

ec: Wendy Licht

030602008 GA Wintzer + Son Co. 6/27/09

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GA Wintzer + Son Co
 PO Box 406
 5511 W. Shubert St
 Marietta, GA 30066

PS Form 3800, August 2006 See Reverse for Instructions

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