



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
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TELE: (419) 352-8461 FAX: (419) 352-8468
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Marion County
Glen-Gery Corporation, Iberia Plant
Premise #0351000051
Notice of Violation

May 26, 2010

CERTIFIED MAIL

Mr. Mike Krzyzanowski, Environmental Manager
Glen-Gery Corporation
433 South Pottsville Pike
Shoemakersville, PA 19555

Dear Mr. Krzyzanowski,

This letter shall serve as a follow-up to the inspection conducted on May 5, 2010 at the above referenced facility by this writer. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at the facility. Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

The company currently operates a 47.6 mmBtu/hr, natural gas-fired tunnel kiln (emissions unit P008) used for firing brick, with an associated fluorine cascade absorber to limit the potential hydrogen fluoride emissions. The company has chosen to use the control equipment to avoid Maximum Available Control Technology (MACT) applicability. In addition, due to the level of potential "pre-control" hydrogen fluoride emissions, the company is required to have a Compliance Assurance Monitoring (CAM) plan in place for the control equipment.

Within the requirements of the company's Title V operating permit, #P0087298, effective December 4, 2008, and in accordance with the CAM plan, daily monitoring/recordkeeping of the pressure drop across the fluorine cascade absorber and visual inspections of the control equipment are required as indicators of emission control. The required pressure drop range was established at 0.3 – 3.0 millibars based on a manufacturer's specification ensuring there is no blinding of the scrubbing media or physical damage to the control equipment components.

During the inspection, it was noticed that there were several dates throughout the 2009 and 2010 calendar years where the fluorine cascade absorber was being operated outside of the established pressure drop range.

Mr. Mike Krzyzanowski
May 26, 2010
Page Two

A note was written next to each of these dates by a lab technician, indicating that "an adjustment was made" in order to return the pressure drop reading to acceptable levels. However, the specific adjustments that were made are not noted.

Since the date of the inspection, the company has provided Northwest District Office (NWDO) with an explanation for these deviations. Following a complete inspection of the pressure reading equipment by facility personnel, the company identified a break in the line on the reduced pressure side of the absorber causing inaccurate pressure drop readings to be recorded. The lines were replaced and cleaned, allowing the pressure drop to return to levels similar to when the control equipment was first installed. The plant operator log sheets have also been updated and preventative maintenance checks are being added which incorporate routine inspections of the pressure lines.

Although operating the fluorine cascade absorber outside of the specified range does not directly indicate an emissions violation, this parameter was established by the company in the CAM plan as an indicator of emission control. Likewise, through the Title V operating permit, the company is required to properly install, operate and maintain equipment to monitor the pressure drop across the control equipment while the emissions unit is in operation. Furthermore, the company is required to submit deviation reports that identify all periods of time when the pressure drop across the fluorine cascade absorber was not maintained in accordance with the requirements of the operating permit. Each failure to properly maintain the monitoring equipment is a violation of the monitoring and recordkeeping requirements of the Title V operating permit, CAM plan and Ohio Revised Code Section 3704.05. Each failure to report pressure drop deviations is a violation of the Standard Terms and Conditions of the Title V operating permit, reporting requirements of the Title V operating permit and ORC Section 3704.05.

NWDO requests that the company submit a written response to this letter providing what adjustments were made to the control equipment in order to return the pressure drop reading within the acceptable range. In addition, the company is required to submit revised quarterly compliance reports for all instances where the pressure drop reading was recorded outside of the established range. Revisions to Title V compliance certifications for 2009 and 2010 are necessary also. The written response, along with all revised compliance reports, is required by June 25, 2010.

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

Mr. Mike Krzyzanowski
 May 26, 2010
 Page Three

At this time, I would like to thank you and Paul Moodespaugh for the courtesy that was extended during the site visit. If you have any questions and/or comments about this letter, please feel free to contact me electronically at brian.riedmaier@epa.state.oh.us or by phone at (419) 373-3110.

Sincerely,



Brian Riedmaier
 Division of Air Pollution Control

/lb

pc: Tom Kalman, DAPC-CO
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