



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.ohio.gov

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

Re: Marion County  
Ohio Galvanizing Corporation  
467 West Fairground Street  
Marion, OH 43302  
Premise #0351010073  
**Notice of Violation (NOV)**

May 18, 2010

CERTIFIED MAIL 7006 0100 0004 1318 3781

Mr. Frank T. Bellamy  
Vice President  
Ohio Galvanizing Corporation  
467 West Fairground Street  
Marion, OH 43302

Dear Mr. Bellamy:

This letter shall serve to document the results of our ongoing complaint investigation relevant to air contaminant emissions from Ohio Galvanizing Corporation's (OGC) zinc galvanizing operations at the above-referenced facility. It also provides our response to the company's letter dated July 15, 2009, our subsequent meeting on July 8, 2009 at the facility, and the status of the company's April 15, 2009 request for a permit modification. Based on the information we have received and gathered to-date, our findings are summarized as follows:

- The Division of Air Pollution Control (DAPC) has, for several months, been investigating complaints of excessive air contaminant emissions including, but not limited to, HCl and particulate matter from the above-referenced facility. We are continuing to gather more information on a weekly basis. Based on the information gathered to-date, it has been determined that air contaminant emissions from OGC's hot-dip zinc galvanizing operation are causing a public nuisance in violation of Ohio Administrative Code (OAC) rule 3745-15-07(A).

The evidence shows emissions from the facility are being released in a manner and in quantities that endanger the health and welfare of the public and are causing damage to property. NWDO has multiple videos of excessive emissions from the facility. We also have multiple observations by Ohio EPA staff and have corroborated the validity of multiple complaints from multiple complainants. These observations/videos all show that the passive exhaust characteristics of the building result in significant emission downwash and inadequate dispersion.

OGC must submit a detailed plan to alleviate the nuisance. At a minimum and not precluding the possibility of being required to install air pollution control equipment, we believe the company must install a ventilation system to exhaust the HCl fumes and particulate emissions from the pickling line, pre-flux line, the zinc galvanizing kettle and the quenching operation. These emissions would need to be vented to a stack or stacks of sufficient exhaust volume, velocity and height, as determined by modeling, to provide adequate dispersion. The stacks would also need to be designed such that emissions testing can be conducted.

- Our review of the company's application for a permit modification submitted on April 15, 2009 has determined that the application is technically incomplete for the following reasons:

1. We have determined the HCl emission calculations submitted in the past do not properly quantify emissions from the pickling operations. The calculations provided emissions based solely on a theoretical evaporation rate from an open, undisturbed tank. They do not factor in the emissions from the reaction that occurs when the parts are dipped or the surface area of the HCl coated parts as they leave the tanks. HCl emissions are directly related to steel throughput rates (square footage) and we believe the only way to accurately measure them is through testing. We have actual stack test data from an almost identical operation that shows much higher HCl emission rates.

We believe HCl emissions are underestimated and actual emissions exceed the permit allowable limit of 0.08 lb/hr. Please note that the incorrect representation of HCl emission rates also prevented us from conducting proper BAT determinations in previous permitting actions and these will need to be re-evaluated. The accuracy of particulate emission estimates is also questionable.

Pursuant to the requirements of OAC rule 3745-15-04(A), OGC is required to conduct HCl and particulate matter emissions testing in accordance with the provisions in the rule. Due to building's current design, it will be necessary to construct temporary enclosures, etc. to meet proper test methodologies. Please submit the company's test plan within 30 days from the date of this letter. We fully expect a pre-meeting will be necessary to discuss the details.

2. The company needs to submit a detailed explanation of the chemical reactions that occur in each step (caustic tank, pickling tanks, pre-flux tank, galvanizing kettle and quench tank) of the operation. In addition, please describe "worst case" operating scenarios for the line i.e. the production practices that result in the most significant chemical reactions and/or emission rates. We are interested in observing all such operations.

For example, we were informed that baskets that carry parts through the line end up being galvanized along with the parts and, when these galvanized baskets are returned to the HCl tanks, the reaction that occurs in this "stripping" operation is significant. Please notify us when we can observe this operation.

Mr. Frank Bellamy  
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3. Please explain why increasing the zinc usage rate will not result in an increase in the steel throughput rate. If steel input rates will increase, OGC must account for the increase in HCl emissions that will occur.

Pursuant to the provisions of OAC rule 3745-31-05(A)(2) and (3), the Director cannot approve a PTIO application for an emissions unit that is being operated in violation of applicable laws and does not employ BAT. At this time, OGC has the options of either voluntarily withdrawing the application or having the agency issue a denial of the PTI application. A denial would be a final action of the Director of Ohio EPA which OGC could appeal. The company may reapply when these issues are corrected.

- OGC has installed and is operating an unpermitted and uncontrolled burn-off furnace that is employed to salvage zinc contained in the slag from the galvanizing kettle. These are violations of OAC rules 3745-31-02(A)(1) and 3745-31-05(A)(3). It is also a violation of ORC section 3704.05.

The company must immediately submit a PTIO application and conduct emissions testing. At a minimum, OGC must demonstrate the furnace is being operated in compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-09(B) and (C). BAT requirements may be more restrictive and contain additional emission restrictions.

Please respond within 15 days from the date of this letter as to when the PTIO application and the intent-to-test will be submitted. The application should include a detailed analysis of the chemical composition of the slag and whether chlorinated compounds are present. Priority should be given to conducting the emissions testing.

Please be advised that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. These matters are being referred to our Central Office for proper resolution.

If you have any questions and/or comments about this letter, you can call me at (419) 373-3118 or e-mail me at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control  
/lb

pc: Don Waltermeyer, DAPC - NWDO  
Lisa Holscher, US EPA Region 5  
Tom Kalman, DAPC - CO  
Jim Orlemann, DAPC - CO  
Mike Hopkins, DAPC - CO  
Bryan Zima, Legal - CO

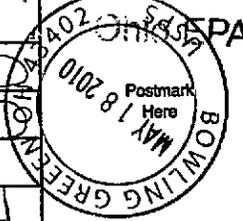
ec: ~~DAPC - NWDO, Marion County, File~~  
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Erin Shalabe, DAPC - NWDO

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Sent To Mr. Frank Bellamy, Vice President  
 Street, Apt. No. Ch. Bellamy Corporation  
 or PO Box No. 441 W. Fairground St.  
 City, State, ZIP+4 Mason OH 43302