



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

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  
Ohio Galvanizing Corporation  
467 West Fairground Street  
Marion, Ohio 43302  
Premise #0351010073  
Notice of Violation

June 1, 2009

**CERTIFIED MAIL**

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

Dear Mr. Bellamy:

This letter shall serve as a follow-up to the complaint investigation and site inspection conducted on May 11, 2009, at the above referenced facility. The purpose of the investigation was to determine the validity of the complaint. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at this facility with the rules and regulations of the Division of Air Pollution Control (DAPC).

Based on discussions with Mr. Ray Thacker, the Operations Manager, observations during the inspection and a review of the company files, the findings of this investigation and inspection are summarized as follows:

1. Ohio Galvanizing Corp. (OGC) operates a hot-dip zinc-galvanizing process. In addition, OGC operates a processing line that includes one caustic tank, four hydrochloric acid pickling tanks, two rinse tanks and one pre-flux tank that precede the galvanizing kettle. This process was initially issued a Permit to Install (PTI) #03-8219 on September 28, 1994. The emission unit (EU) was identified as zinc galvanizing process and was assigned source number P001. The PTI was based upon 1,000 tons of zinc usage per year and 12% hydrochloric acid (HCl) solution for the pickling baths operating at 90 degrees Fahrenheit.

A modification to the original PTI was issued on July 31, 1996, (PTI #03-9832) to correct a couple of discrepancies and increase hydrochloric acid emissions due to an increase in size of the pickling baths. An administrative modification was also issued on October 27, 1999, to correct the source number designation for this EU from P001 to F001 to indicate Ohio EPA's determination that emissions from the line were fugitive.

This EU was re-permitted by the issuance of PTI #03-13814 on September 10, 2002. This PTI increased the zinc usage to 3,000 tons per year but reduced the HCl solution to 7% by weight at 90 degrees F. The EU was assigned a new source number F002 since the process line was rebuilt after a fire. Another modification was issued under PTI #03-16041 on October 23, 2003. The limitations remained the same but the EU was assigned source number F003.

2. OGC submitted the fourth quarter deviation report, as well as the annual report for year 2008, which we received on January 26, 2009. The reports identify that the zinc usage restriction was exceeded by 21.9 tons. This is a violation of the operation restriction identified in PTI #03-16041, as well as Ohio Revised Code 3704.05. In addition, OGC violated the particulate emission limitation stated in the PTI based on this exceedance. OGC submitted an application requesting a modification to increase the annual zinc usage from the current 3,000 tons to 3,500 tons. This application was received on April 15, 2009, and has yet to be issued.
3. The emission calculations pertaining to the HCl bath process were based on "Estimating Releases for the Toxic Chemical Release Inventory Form" dating back to the initial application in 1994. A facility located in the Northwest District Office (NWDO) jurisdiction conducted actual HCl emission testing of a similar HCl pickling line using US EPA approved methodologies. The emission factor derived from their test was 0.253 pounds of HCl per ton of material produced which is significantly higher than the theoretical rate calculated by the company. We are continuing to investigate more updated emission factors for the industry and will need to further discuss this matter before issuance of the permit.
4. OGC records were not located and/or available during the inspection as required by the permit. It is necessary that OGC explain how the hydrochloric acid content (in weight %) in each tank is measured on a daily basis. Mr. Thacker was unable to explain how this process is done. Records of this should be submitted for review for the period of January 1, 2009 to April 30, 2009.

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Please also submit records of annual HCl usage from 2005 to current. In addition, daily and/or weekly usage amounts are necessary from March 1, 2009, to May 22, 2009. A detailed description of the (amount) removal and addition of the pickling solution is necessary. The description shall also include the amount of HCl and water that initially comprise the solution.

OGC operates a paved and unpaved roadway that is unpermitted. Since this EU may have emissions in excess of de minimis as defined in OAC rule 3745-15-05, OGC is required to submit emission calculations and/or appropriate Permit to Install and Operate application and Emissions Activity Category form to rectify this oversight. OGC is to submit this information along with any required applications by no later than July 17, 2009. 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. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or comments about this letter, you are welcome to call me at (419) 373-3110 or e-mail me at [brian.riedmaier@epa.state.oh.us](mailto:brian.riedmaier@epa.state.oh.us).

Sincerely,



Brian Riedmaier  
Environmental Specialist  
Division of Air Pollution Control

/llr

pc: Don Waltermeyer, DAPC/NWDO  
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