



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

RE: Ottawa County  
Brush Wellman, Inc.  
Premise #03 62 00 0009  
**Notice of Violation/HPV,GC2**

Certified Mail

September 30, 2008

Mr. Troy Kajfasz, Manager of Environmental Services  
Brush Wellman, Inc.  
14710 W. Portage River South Road  
Elmore, OH 43416

Dear Mr. Kajfasz:

This letter shall serve as a follow-up to the inspection that was conducted at the facility on September 15 and 16, 2008 by this writer from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). Based on discussions and observations during the inspection, and recent conversations, along with a review of the company's files, my findings are as follows:

1. Brush Wellman was issued a final Title V permit on March 16, 2004 for the facility. The permit contains the following applicable facility term and condition: the ambient concentration of Be in the vicinity of the facility shall not exceed 0.01 micrograms per cubic meter, averaged over a 30-day period. According to the letter received by our office on September 23, for the month of August, Station #13 had an average concentration of 0.0196 micrograms of Be per cubic meter. This is a violation of the Title V permit, 40 CFR 61.32 (b) and Ohio Revised Code 3704.05

Per our correspondence previous to the inspection, Brush Wellman feels the most probable cause of the high reading was the mowing around Lagoon #5 the first week in August. Due to the dry weather in August, more sediments were exposed and there were some areas of the dike wall where the sludge was also exposed. Based on the higher readings on the two monitors near Station #13 that same week in August, and the prevailing winds that week, the mowing event appears to be the most probable cause of the exceedance. No process upsets or control device malfunctions were discovered.

As a result of the ambient monitoring violation, our office is requesting a written response to this letter by November 3, 2008, which includes, at a minimum, the following information: 1) a summary of the actions taken to review which processes were running the week of the mowing, and if there were any unusual events that occurred which may explain the violation, 2) the history of the flows into lagoon #5 over the past decade, 3) Brush Wellman's interim measures and the long term corrective actions to address the violation.

2. The company was issued PTI's recently for P111 and P112, the South Beryllium Research and Development and the Bulk Products Plate Aging Furnace. The company failed to address these emission units in their 2<sup>nd</sup> quarter deviation report. On September 23, our office received an amended 2<sup>nd</sup> quarter deviation report which included emission units P111 and P112. This item is considered resolved.

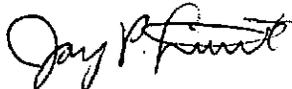
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3. The following emission units have been shutdown at the facility:

B005 12 mmBTU/hr N.G.-fired boiler, (Boiler #5)  
P062 Fluoride Calciner  
P098 Fluoride Decomposition Furnace #6  
P099 Fluoride Decomposition Furnace #7  
P100 Fluoride Decomposition Furnace #8  
P101 Fluoride Decomposition Furnace #9  
P102 Reduction Furnace #1  
P103 Reduction Furnace #2  
P104 Reduction Furnace #3  
P105 Reduction Furnace #4  
P106 Pebble Plant Material Handling

Thank you for the courtesy extended during my visit. Please be advised that the submission of the requested 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 on whether to pursue or decline to pursue such penalties regarding this matter at a later date. Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,



Jay P. Liebrecht  
Environmental Specialist

/lb

pc: Don Waltermeyer, DAPC-NWDO  
Eric Getz, DAPC-NWDO  
Sam Araj, DAPC-NWDO  
Tom Sattler, DAPC-NWDO  
Tom Kalman, DAPC, CO  
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