



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
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
NOV Response Letter

November 14, 2008

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

Dear Mr. Kajfasz:

The Division of Air Pollution Control (DAPC) has reviewed Brush Wellman's letter of October 31, 2008. It contained responses to DAPC's September 30, Notice of Violation (NOV). This NOV was issued to the company for emissions exceeding the NESHAP ambient concentration for Beryllium.

Brush Wellman's response included a summary of the ambient air monitoring results for the month of August, the chronology of events surrounding the exceedance and a history of flows into lagoon #5 over the past decade. This data provided a good summary of actions taken by the company related to the exceedance and historical information about the outplant results and lagoon #5 flows. The response also described how the company determined that air pollution control equipment was operating correctly following the elevated ambient air monitoring results for the week ending August 11, 2008.

Based on the ambient results from August 11 through August 15, Brush Wellman determined that the cause of the exceedance was not due to normal production operations at the facility. The company provided a summary of the unusual or maintenance activities for the week of August 4 through August 11. These three pages of activities point to the mowing event that occurred on August 5 and 6 as the most probable cause for the exceedance.

Lastly, the response also included corrective actions to prevent the re-occurrence of the most probable cause of the elevated Be concentrations. Brush Wellman will no longer disturb the sediments inside the lagoon dike walls. The action taken to ensure this was to place a physical barrier over the sediments to prevent them from being disturbed.

The company decided to install a geo-textile and soil cover and completed the project on October 14. Brush Wellman first applied a geo-textile cover on the dike walls. Then, soil was placed on the geo-textile to hold the geo-textile in place over the sediments. The DAPC and the Division of Surface Water have reviewed the corrective action plans and have found them to be acceptable.

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We appreciate the company's prompt and thorough response to correcting this violation. 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
Division of Air Pollution Control

/csi

pc: Don Waltermeyer, DAPC-NWDO
Eric Getz, DAPC-NWDO
Sam Araj, DAPC-NWDO
Tom Kalman, DAPC, CO
Mike Mereb, DAPC, CO
Lisa Holscher, US EPA-Region V
,DAPC NWDO File)