



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: Sandusky County
0372010227
Stack Test
Notice of Violation

February 6, 2009

CERTIFIED MAIL
7002 2410 0003 1155 9987

Mr. Chris Kiser
Garfield Alloys, Inc.
29695 Pettibone Rd.
Glenwillow, Ohio 44139

Dear Mr. Kiser:

The stack tests conducted on November 19-21, 2008, on Ohio EPA emissions units P901 and P902, have been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

Critical Test Data
(In Three Run Averages)

Pollutant	Actual Emission Rate*	Allowable Emission Rate	Source Operating Rate*	Maximum Source Operating Rate*
PM	1.81 lbs/hr 25.2% removal efficiency	0.42 lb/hr (P901) 0.42 lb/hr (P902) 95% removal efficiency	3087 lbs/hr	3000 lbs/hr
HCl	1.76 lbs/hr 0% removal efficiency	0.5 lb/hr (P901) 0.5 lb/hr (P902) 97% removal efficiency	3087 lbs/hr	3000 lbs/hr
NO _x	0.35 lb/hr	3.75 lbs/hr (P901) 3.75 lbs/hr (P902)	3087 lbs/hr	3000 lbs/hr
CO	2.59 lbs/hr	2.1 lbs/hr (P901) 2.1 lbs/hr (P902)	3087 lbs/hr	3000 lbs/hr

* P901 and P902 combined

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Because P901 and P902 are physically united, i.e., they share a common stack, the test results for NO_x and CO should be considered to show the units to be jointly in compliance with the emissions limits for these pollutants. The permit will be administratively modified to reflect this.

This emission test was conducted in response to a July 31, 2008 Notice of Violation (NOV) resulting from a June 9, 2008 complaint investigation. Based on the results of the test, emissions units P901 and P902 were being operated in violation of their allowable emissions rates for PM and HCl and did not meet the required removal efficiencies for these pollutants. These are violations of Permit to Install (PTI) 03-13824 issued on October 29, 2002, OAC rule 3745-31-05 and Ohio Revised Code 3704.05.

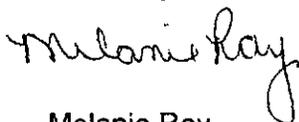
Prior to submitting the final stack test report, MagReTech contacted the Northwest District Office (NWDO) to discuss the test results and their plan of action. In a letter dated December 5, 2008, the company explained how a complete inspection was performed on the baghouse, bags and inlet/outlet duct work for leaks, holes or other obvious indicators that emissions were passing through. Nothing was found during these inspections, and after discussion with the baghouse manufacturer and filter bag manufacturers, it was determined that the problem with the removal efficiency was likely attributed to the fact that the company was using a combination of laminated bags and P84 felt bags.

The bags were then sent off for permeability testing which verified that the P84 bags showed decreased permeability (were plugged) and the Gortex (laminated) bags showed a substantial increase in CFM being passed through the bags. Based on this information, the company did a full changeover of bags to the P84 bags and a retest to show compliance was conducted on January 27-29, 2009.

MagReTech has thirty days to submit the results from the retest and once they are reviewed, this office will respond accordingly. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the 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.

Please feel free to contact me with any questions and/or comments at 419.373.4111 or email melanie.ray@epa.state.oh.us

Sincerely,



Melanie Ray
Division of Air Pollution Control
/csi

pc: Don Waltermeyer, DAPC-NWDO
Melanie Ray, DAPC-NWDO
Tom Kalman, DAPC-NWDO
Robert Teer, DAPC-NWDO
Tom Sattler, DAPC-NWDO
Lisa Holscher, US EPA

'DAPC-NWDO File'
Stack File
Follow-Up File
ec: Wendy Licht

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GARFIELD ALLOYS INC
29695 PETTIBONE RD
GLENWILLOW OH 44139

PS Form 3800, June 2002 See Reverse for Instructions

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR CHRIS KISER
GARFIELD ALLOYS INC
29695 PETTIBONE RD
GLENWILLOW OH 44139

DAPC/M. Ray/csl

COMPLETE THIS SECTION ON DELIVERY

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 Chris Kiser Addressee

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3. Service Type
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2. Article Number *7002 2410 0003 1155 9987*