



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Sandusky County  
0372010227  
MagReTech, Inc.  
Stack Test

April 29, 2009

Mr. Chris Kiser  
Director of Environment and Safety  
MagReTech, Inc.  
29695 Pettibone Road  
Glenwillow, Ohio 44139

Subject: January 27-29 stack test review and preliminary resolution to Notice of Violation (NOV) issued on July 31, 2008.

Dear Mr. Kiser:

MagReTech, Inc. (MagReTech) was issued a NOV on July 31, 2008. In it, we questioned the operational efficiency of the baghouse controlling the two melt furnaces (emissions units P901 and P902) and cited the company for excess particulate emissions from the baghouse control system and for the installation of a crushing operation without first obtaining the proper permits. This letter shall serve to update the company on the status of these violations and provide our review of the January 27-29 compliance tests performed on the two melt furnaces.

In the NOV, we required the company to conduct emissions/control efficiency tests as soon as possible. Testing was subsequently performed on November 19-21, 2008. The tests showed emissions units P901 and P902 were being operated in violation of their allowable emissions rates for PM and HCl and the baghouse control system did not meet the required removal efficiencies for these pollutants. In response to the failed tests, the company shutdown its melting furnaces and performed maintenance on the control system which included a complete bag changeover.

The furnaces were then restarted shortly before the January 27-29 testing that was again conducted to determine the compliance status of these units. Based upon our observations during the tests and review of the test report, the testing was conducted in conformance with Ohio EPA methods and procedures. Our review also confirms the following reported data is accurate:

**Critical Test Data  
 (In Three Run Averages)**

<b>Pollutant</b>	<b>Actual Emission Rate*</b>	<b>Allowable Emission Rate</b>	<b>Source Operating Rate*</b>	<b>Maximum Source Operating Rate*</b>
PM	0.06 lb/hr 97.67% removal efficiency	0.42 lb/hr (P901) 0.42 lb/hr (P902) 95% removal efficiency	2993 lbs/hr	3000 lbs/hr
HCl	0.07 lb/hr 94.74% removal efficiency	0.5 lb/hr (P901) 0.5 lb/hr (P902) 97% removal efficiency	2993 lbs/hr	3000 lbs/hr

\*P901 and P902 combined

- During the test the baghouse pressure drop averaged 2" water for the first test run (January 27), 2.5" water for the second test run (January 28), and 2.75" water for the third test run (January 29).

Based on the results of the recent tests, the emissions units were being operated in compliance with both the allowable PM and HCl limits and the PM removal efficiency. However the removal efficiency for HCl did not meet the 97% efficiency required by the PTI. A February 24, 2009, letter from the company explained that the deficiency was likely the result of the limited period of time that the source was in operation prior to the compliance test. Because the melting furnaces were immediately shut down following the previous failed test so that the company would not be operating out of compliance and the company did not resume operation until all the bags were replaced in the baghouse, the bags did not have time to become caked and seasoned which improves their efficiency. This was verified in the fact that the removal efficiency increased with each run of the test.

MagReTech has indicated that they do not believe that the permit reflects the current operating conditions at the facility and plans to request an administrative modification to the permit. Because of the circumstances cited above, we agree that a slight decrease in the HCl removal efficiency level would be appropriate to cover time periods after bag replacements. The request for the administrative modification should be submitted by May 27, 2009.

The status of the other violations are as follows:

Excess emissions from baghouse control system: In the July 31, 2008 NOV, MagReTech was cited for having excess emissions from a man-way on the bottom of the baghouse cone and not reporting this as a malfunction. A malfunction notice was submitted on September 15, 2008, that indicated the man-way had previously been opened and was not properly secured. Maintenance personnel said that the man-way was not leaking on previous shakedown and must have come loose at that time of our visit. In order to correct this from occurring again, the company immediately replaced the gasket and securely bolted the opening.

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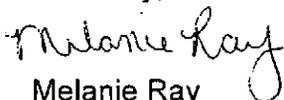
The NOV also cited excess emissions from the uncovered hopper into which the baghouse fines are emptied. In the same September 15, 2008, letter, the company stated that an enclosure was fabricated to encompass the hopper and eliminate any emissions from escaping. This hopper and the man-way have also been included in the weekly maintenance checks. The Northwest District Office (NWDO) feels these are sufficient solutions to these issues and no further action is required at this time.

Crusher: MagReTech submitted a permit to install/operate (PTIO) application for the crusher system on October 24, 2008, and a final permit was issued on March 2, 2009. The company committed to installing a baghouse to control emissions from the crusher building. Based on the information supplied in the application, this office believes the baghouse is adequate in controlling emissions from this source. The crusher will not be operated until the control device is installed.

Aluminum silicate and scrap material usage: In the NOV, we also requested additional information pertaining to aluminum silicate recordkeeping and scrap material being melted. As stated in the response received on September 29, 2008, the company immediately began reporting aluminum silicate feed rates in pounds per hour and purchase records for the past two years were provided. Records detailing materials melted over the previous two years were also submitted along with a copy of the inspection and verification instruction form. The submittal of this information addresses the concerns of the NOV and no further action is being requested at this time.

The NWDO would like to thank MagReTech for their prompt response to address all issues outlined in the July 31, 2008 NOV. Once the company submits a request for an administrative modification to PTI 03-13824 to correct the HCl removal efficiency and other discrepancies with the permit, this office will consider all issues of the NOV resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Sincerely,



Melanie Ray  
Division of Air Pollution Control  
/csl

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