



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

Re: Seneca County  
National Electrical Carbon, Inc.  
Premise # 0374010109  
Notice of Violation (NOV) letter

September 9, 2010

**CERTIFIED MAIL**

Ms. Gretchen L. Curry, Quality Manager  
National Electrical Carbon, Inc.  
200 North Town Street  
Fostoria, Ohio 44830

Dear Ms. Curry:

This letter shall serve as follow-up to the inspection conducted on July 28, 2010, of National Electrical Carbon, Inc. (herein referred to as NEC). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units with the rules and regulations of the Division of Air Pollution Control (DAPC). Attending the inspection was yourself, Misters Bennett Thayer and Geoff Westphal of August Mack Environmental and NEC's Corporate Environmental Coordinator, Mr. Norbert Dickman.

Based on our discussions, my observations during the inspection, and a review of the NEC files at the Northwest District Office (NWDO), my findings can be summarized as follows:

1. Emission unit (EU) described as #1 National Furnace for trash incineration and identified as N002 was viewed during the inspection. The Title V application that was submitted on April 6, 2010 specifies limitations on this EU. One of those limitations is that all emissions from N002 shall be vented to the thermal oxidizer. During the inspection, fugitive emissions were visible while the EU was in operation. There does not appear to be complete capture of emissions from this process that vent to the oxidizer. The same applies to the dozen furnaces labeled as #1 National Furnaces (EU ID P012) and the dozen #2 National Furnaces (EU ID P013). The visual observations are contrary to the information in the TV application. Therefore, this issue must be re-evaluated.
2. As mentioned during the inspection, the fee emission reports for years 2006, 2007, 2008 and 2009 vary significantly in terms of the combined emissions from N002, P012 and P013, even though operational usage did not differ much from year to year.

The table summarizes this issue with values in units of ton:

Pollutant Year	Nitrogen Oxides (NO <sub>x</sub> )	Sulfur Dioxide (SO <sub>2</sub> )	Particulate Matter (PE)	Carbon Monoxide (CO)	Volatile Organic Compounds (VOC)
2006	55.2	16.82	1.37	Not reported	1.4
2007	55.2	16.82	0.79	Not reported	1.4
2008	5.8	4.58	0.74	0.2	1.6
2009	3.55	2.98	0.74	0.02	0.82

As can be clearly noted, there is a discrepancy in terms of emissions that requires clarification by NEC.

3. Permit to Install (PTI) #03-6950 issued final on March 31, 1993 required NEC to conduct stack testing of emission unit N002 for both PE and NO<sub>x</sub>. After having reviewed the stack tests conducted of this emissions unit, it is apparent that testing of NO<sub>x</sub> had never been done. This is a violation of the Performance Test Requirements in the referenced PTI as well as a violation of Ohio Revised Code (ORC) 3704.03. A compliance plan and schedule is necessary to address this violation.
4. NEC is required to submit how many batches have been burned in N002 each year for the previous five years.
5. The following reports have been submitted in violation of the terms and conditions of the respective permits:

Quarterly Report	Due Date	Submitted hardcopy	Submitted via Air Services
Third quarter of 2008	October 31, 2008	October 30, 2008	November 5, 2008
Third quarter of 2009	November 2, 2009	November 3, 2009	February 1, 2010
First quarter of 2010	April 30, 2010		May 3, 2010

The reports were submitted late and as such, NEC is in violation of the reporting requirements in each respective PTI as well as the Title V permit issued on November 14, 2001. This is also a violation of ORC 3704.03. It should be noted that NEC submitted the third quarter report of reporting year 2009 on November 3, 2009 as a hard copy stating that there were technical difficulties submitting in Air Services. It was further noted in the letter that this report will be submitted via Air Services as soon as the technical difficulties are resolved.

6. There is no information in the file pertaining to the facility operations in terms of applicability to the National Emission Standards for Hazardous Air Pollutants (NESHAP). Therefore, it is necessary that NEC provide ample evidence and supporting information detailing applicability or non-applicability to each:

NESHAP Standard	CFR Subpart	Compliance Date
Industrial, Commercial and Institutional Boilers and Process Heaters	DDDDD	09/13/2007
Refractory Products Manufacturing	SSSSS	04/17/2006
Generic MACT II – Carbon Black Production	YY	07/12/2005
Carbon Black Production (area sources)	MMMMMM	

7. There is no information in the file pertaining to the facility operations in terms of applicability to the National Standards of Performance for New Stationary Sources (NSPS). Therefore, it is necessary that NEC provide ample evidence and supporting information detailing applicability or non-applicability to the following:

NSPS Standard	CFR Subpart
Emission Guidelines and Compliance times for Commercial and Industrial Solid Waste Incineration Units that commenced construction on or before November 30, 1999	DDDD

8. The information requested by my associate, Ms. Peggy Argabright, on April 13, 2010, and not yet answered will need to be submitted as soon as possible in order for the processing of the Title V permit to proceed. In order to further this process along, the questions as detailed in the e-mail are summarized for your convenience:

- a. The process flow diagram of P011 doesn't show any uncontrolled emissions contrary to the Facility Profile of that emission unit. This matter will need to be rectified. This shall also be reflected in the emissions reporting which it appears it has not.
  - b. The process flow diagram of P008 has been updated to show uncontrolled emissions. However, this has not been reflected in the past in determining emissions. This matter will need to be addressed.
  - c. The Facility Profile for emission unit P079 is still not correct. As pointed out in the e-mail response, DC61-02 is no longer present as a control device. This correction will need to be made to the Facility Profile and submitted as such.
  - d. The facility has yet to submit a revised process flow diagram of P126 and P127 that reflects eight emission units venting to the same dust collector, DC42-52.
  - e. There appears to be an issue with what is deemed as an insignificant source in terms of Title V. Please note that, at least, the following emission units status needs to be addressed in terms of significant or insignificant status:
    - i. North 20 gallon mixer for brush mixing (P097)
    - ii. South 20 gallon mixer for brush mixing (P098)
    - iii. Electric Bake Furnaces (P111 through P118)
    - iv. Electric Graphitizing Furnaces (P131 through P161)
9. The two kilns, identified as emission unit as P094 and P101, were viewed during the inspection. It was stated that the primary burner operates at 1300 degrees Fahrenheit and the afterburner operates at 1500 degrees Fahrenheit. This information does not correspond to the Title V permit application. Please confirm the operating temperatures of the primary and secondary chambers, both normal and potential.
10. The particulate emissions from P094 and P101, as indicated in the TV permit application, is based on stack test results. The basis for this value will need to be submitted. In addition, the only HAP pollutant considered emitted from these two units is polycyclic organic matter. The MSDS of all binders that are used in these emission units needs to be submitted. Carbon disulfide emissions have been reported from these types of operations depending on the binder used.
11. HAP emissions will need to be tabulated and submitted for each emission unit. The emissions will be actual and potential emissions from each source.

12. The rigid board processing line (emission unit P223) commenced operation on July 5, 2008. Based on this information, it would appear that this emissions unit operated during 2009. However, the actual emissions from this unit were submitted as being less than one ton per year. The same applies to emission units P126, P127 and P128. NEC will need to submit information as to why emissions are much lower than the allowable for the indicated emission units.
13. Provide an explanation as to why the Facility Profile lists emission units P006 and P066 as both being identified as Bldg. 61 Lindberg Ovens and both as operating emission units. If these two EU numbers are considered duplicates, it is recommended that one of those two is invalidated from the Facility Profile.
14. Provide an explanation as to why the Facility Profile lists emission units P070 and P089 as both being identified as Cloth Graphitizer and both considered as operating emission units.
15. Provide an explanation as to why the Facility Profile lists emission units P067 and Z012 as both being identified as blending/crushing/mill system and both considered as operating emission units.
16. It appears in the Facility Profile that a few of the emission units were erroneously listed as permanently shutdown. Those emission units should have been listed as invalid instead. The emission units in question are Z001, Z002, Z006 and Z061.
17. The following emission units were not witnessed during the inspection and therefore confirmation of the operating status is necessary:
  - a. Bldg. 77 Bake Furnaces (P083)
  - b. Manual Copper Plating (P086)
  - c. Sawing and cleaning pipe and tube stock (P217)
  - d. Autocore and Mixing Process (Z003)
  - e. Sagger Packing Station (Z004)
  - f. Core Mix and Plug Cool (Z005)
  - g. Vertical Pellet Mill (Z009)
  - h. Crusher/Mill/Screen (Z012)
  - i. Emission units Z014 through Z022
  - j. Emission units Z025 through Z046
  - k. Emission units Z048 through Z054
  - l. Emission units Z057 through Z060
  - m. Emission units Z063 through Z065

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The information required above must be submitted by no later than October 14, 2010. 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 a 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 concerning this letter, please feel free to contact me at the above address, by calling (419) 373-3118 or by e-mail at [mohammad.smidi@epa.ohio.gov](mailto:mohammad.smidi@epa.ohio.gov).

Sincerely,



Mohammad Smidi  
Environmental Specialist  
DAPC - NWDO

/llr

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PS Form 3800, August 2006 See Reverse for Instructions

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