



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: D.S. Brown Company  
300 E. Cherry Street  
North Baltimore, OH 45872  
Premise #0387000118  
Warning Letter

April 3, 2009

Ms. Jennifer McGuckin  
E H & S Manager  
D.S. Brown Company  
300 East Cherry Street  
North Baltimore, Ohio 45872

Dear Ms. McGuckin:

This letter shall serve as the follow-up to the inspection conducted on March 10, 2009, at the above referenced facility. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at this facility with the rules and regulations of the Division of Air Pollution Control (DAPC).

Based on my discussions with you, as well as observations during the inspection and a review of the company files, the results are as follows:

1. The extruders and presses for rubber products (identified as emissions unit P001) were issued a Notice of Registration per Ohio Administrative Code (OAC) rule 3745-35-05(B) on May 14, 1976. In order to properly reflect the potential emissions of this unit, it is incumbent upon the facility to submit an Emissions Activity Category (EAC) form and emission calculations of criteria pollutants as well as Hazardous Air Pollutants (HAP) for this emissions unit.
2. The thermal spray operation (identified as emissions unit P002) was issued a Permit to Install (PTI) #03-13827 on August 27, 2002. In that PTI, the facility is required to maintain the pressure drop across the control equipment (baghouse) between 3 and 4 inches of water. The information submitted via e-mail on March 20<sup>th</sup> contained pressure drop readings spanning from the first week of 2008 to the most current. The information revealed that the control equipment is operating in violation of the operational restriction by having readings ranging between 0.9 and 2.9 inches of water during that span. The facility is required to submit semi-annual reports identifying any deviations from the pressure drop range indicated in the permit. The facility failed to identify deviations and incorrectly certified compliance with the pressure drop range in the past reports.

In order to resolve this issue, the facility is required to submit a new EAC form for this emissions unit along with any corresponding information that will detail the proper pressure drop range that the baghouse is to operate during normal operation. The changes will then be incorporated into a Permit to Install and Operate (PTIO) that will therefore eliminate the current noncompliance status as it stands.

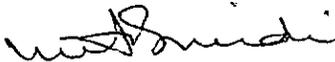
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3. The metal parts cold cleaner (identified as emissions unit L001) was issued PTI # 03-16015 on December 26, 2003. One of the operational requirements stated on page 15 of that permit is that "the cold cleaner shall have a freeboard ratio greater than or equal to 0.7". In the PTI application, the facility does list the freeboard ratio as 0.2. Therefore, this permit contains a requirement that the facility cannot meet. To resolve this issue, the facility needs to determine which requirement stated in OAC rule 3745-21-09(O)(2)(c) can be met by submitting a completed EAC form for this emissions unit.
4. During the inspection, a heater that may no longer be operational was witnessed. Please provide the necessary information on this heater and what it was used for:
  - a. the firing rate in million British thermal units per hour;
  - b. the date it was installed;
  - c. the date it ceased operation; and
  - d. the fuel used in this emissions unit.
5. The issues indicated above may be rectified in the near future with an issuance of a PTIO for all operating emission units.
6. In reviewing the previous required reports, it was determined that the third quarter report of reporting year 2003 is missing from the file.

The company is required to submit the information indicated above by no later than April 30, 2009. 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 the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I appreciate your efforts in accommodating me during this unannounced inspection. If you should have any questions regarding the contents of this letter or any other subject matter, feel free to contact me at (419) 373-3118 or mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control

/csf

ec: Don Waltermeyer, DAPC/NWDO  
Samir Araj, DAPC/NWDO

pc: DAPC/NWDO Facility File