



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Wood County
0387000088
Jones-Hamilton Company
Stack Test
Notice of Violation

March 26, 2010

CERTIFIED MAIL

Mr. Ray Hahn
Jones-Hamilton Company
30354 Tracy Road
Walbridge, Ohio 43465

Dear Mr. Hahn:

The stack test conducted on February 9-11, 2010, on Ohio EPA emissions unit No. P013 (HCl Production Line), has 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 - HCl
(In Three Run Averages)**

Emission Point	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
Scrubber S-221	0.002 lb/hr 98.1% removal efficiency	0.071 lb/hr 95% removal efficiency	9774 lbs/hr	9500 lbs/hr
Scrubber S-501	0.29 lb/hr 97.4% removal efficiency	0.071 lb/hr 99% removal efficiency	9577 lbs/hr	9500 lbs/hr

Also, the following parameters were recorded during the testing:

	Actual	Required
S-221 scrubber liquid flow rate	13.0 gpm	≥ 11 gpm
S-221 scrubber liquid supply pressure	30.8 psi	≥ 10 psi
S-501 scrubber liquid flow rate	18.01 gpm	≥ 12 gpm
S-501 scrubber liquid supply pressure	31.14 psi	≥ 10 psi

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standards(s). Although it generally consists of operating the emissions unit at its maximum input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.



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Emissions unit No.P013 (Scrubber S-501) was being operated in violation of its allowable emissions rate for HCl and also did not meet its required removal efficiency. These are violations of the Permit to Install and Operate P0103785 issued on March 17, 2009, Ohio Administrative Code rule 3745-31-05(A)(3) and Ohio Revised Code (ORC) 3704.05. This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule.

The response should detail the reason(s) for the exceedance and the steps the company will take to bring the emissions unit into compliance. It should also include an explanation on how the company normally operates the scrubber. Of concern is the fact that the liquid supply pressure was three times the minimum required in the permit on the day of the test. Also, please note that, depending on the company's plan, it may be necessary to retest this unit.

The facility is required to submit this information by no later than April 14, 2010. 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.

If you have any questions regarding this letter, please feel free to contact me at (419) 373-3118.

Sincerely,

Mohammad Smidi
Division of Air Pollution Control

/llr

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, US EPA
Robert Teer, DAPC-NWDO
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