OhioEPA
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
0387000046
MSC Walbridge Coatings, Inc.
Stack Test
Notice of Violation

December 9, 2009

CERTIFIED MAIL

Mr. Roger J. Blem
EH&S Manager
Material Sciences Corporation
30610 East Broadway
Walbridge, Ohio 43465-9707

Dear Mr. Blem:

The stack test conducted on September 4, 2009, on Ohio EPA emissions unit P001, has been reviewed. This emissions unit, a zinc or zinc-nickel electro-galvanizing line, is controlled by a mist eliminator and a wet scrubber. The Title V permit issued final on May 11, 2009 required the facility to stack test this emissions unit within six months of the issuance date. This testing met the Title V requirement and was conducted in conformance with Ohio EPA methods and procedures. The review of the stack test report confirms the following reported data are accurate:

Critical Test Data
(In Three Run Averages)

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate**
PM*	< 0.29 lb/hr	1.49 lbs/hr	161, 960 ft^2/hr	288,000 ft^2/hr
Ni*	< 0.0080 lb/hr	0.046 lb/hr	161, 960 ft^2/hr	288,000 ft^2/hr
Zn*	0.562 lb/hr	0.097 lb/hr	161, 960 ft^2/hr	288,000 ft^2/hr

*Zn-Nickel coating

**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 standard(s). Although it generally consists of operating the emissions unit at its maximum material 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.

In addition, the following parameters were monitored and recorded during the stack test:

	Observed	**Required**
Static Pressure Drop Across Scrubber	1.7 inches water	≥ 1.5 inches water
Water Flow through Scrubber	17.7 gallons/minute	≥ 9.5 gallons/minute
Scrubber Pump Pressure	32 psi	≥ 30 psi

It has been determined that source was being operated at a rate that is acceptable for the purposes of this test. The prior applications have listed its maximum source operating rate at 288,000 square foot of metal coated per hour and is the theoretical capacity used in the initial permitting. Although the average source operating rate during the stack test was at 56.2% of this theoretical maximum, it is > 90% of the highest capacity the company has operated the unit in the recent past and anticipates operating at in the future. If production in the future does exceed, by greater than 10%, the rate achieved during these tests, please notify NWDO, DAPC.

The emissions unit was also being operated in violation of its allowable emissions rate for Zn. This is a violation of the Title V permit, OAC rule 3745-31-05(A)(3) and ORC 3704.05. The company is required to submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. We request this be submitted by no later than January 15, 2010.

As discussed in your recent visit to NWDO, the company should elaborate on the research it has done and the steps that have been taken to discern why this exceedance occurred. Although there is suspicion the problem is attributed to the testing, we are unable to discount the test results. It should be noted that testing conducted when only a Zn-based coating was employed showed Zn emissions below the allowable limit. In the absence of any process upset/equipment malfunction, we would accept an administrative modification of the permit to increase the Zn limit as an acceptable compliance plan.

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 contact me by telephone at (419) 373 -3118 or by e-mail at mohammad.smidi@epa.state.oh.us.

Sincerely,

Mohammad Smidi
Division of Air Pollution Control

/llr

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, US EPA
Robert Teer, DAPC-NWDO
Tom Kalman, DAPC-CO
DAPC-NWDO file
Stack File
NWDO Follow-up File
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ec: Tom Sattler, DAPC-NWDO
Wendy Licht, DAPC-NWDO

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Sent To: Beem Material Sciences Corporation
Street, Apt. No.; or PO Box No.: 30610 East Broadway
City, State, ZIP+4: Fraser, MI 48026-9707

PS Form 3800, August 2006 — See Reverse for Instructions

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1. Article Addressed to:

Mr Robert J Beem
CEO & Manager
Material Sciences Corporation
30610 East Broadway
Fraser, MI 48026-9707

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