



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

Re: Ottawa County  
0362000009  
Stack Test  
**Notice of Violation**  
**NOV/non-HPV)/Return to Compliance**

April 24, 2012

**CERTIFIED MAIL**

Ms. Kim Korek  
Materion Brush, Inc.  
14710 West Portage River South Road  
Elmore, Ohio 43416

Dear Ms. Korek:

The stack test conducted on January 17-18, 2012, on Ohio EPA emissions unit number P120, (Furnace Rebuild Operation, Pebble Plant), and P124 (Pebbles Plant Vacuum Cleaning System), 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**  
**(In Three Run Averages)**

<b>Pollutant</b>	<b>Actual Emission Rate</b>	<b>Allowable Emission Rate</b>
PM <sub>10</sub>	0.04 lb/hr, 2.65x10 <sup>-4</sup> gr/dscf	0.0096 lb/hr 0.00007 gr/dscf
Be	1.875x10 <sup>-5</sup> lb/hr	0.00096 lb/hr

In addition, baghouse pressure drops of 1.2 and 1.1 inches of water were recorded during the PM<sub>10</sub> and beryllium (Be) testing, respectively. These did not meet the requirement that they be between (two) and (six) inches of water; however the baghouses are new and should soon be operating within the required range.

During the test one furnace was being torn down and three vacuum lines were operating. It was agreed prior to the test that this would constitute a demonstration that the source was operating at the maximum rate.

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The emissions units were being operated in violation of their allowable emissions rates for PM<sub>10</sub> established under Permit to Install (PTI) P0106604, issued July 20, 2010 violation of terms and conditions C.1.(b)(1)(a) and C.1.(c)(1)(a)), OAC rule 3745-31-05(F), and Ohio Revised Code 3704.05. However, on February 15, Materion applied for an administrative modification of the permit to raise the PM<sub>10</sub> and Be allowable limits. On April 3, 2012, PTI P0109519 was issued final and raised the combined limits for emission units P120 and P124 above the actual emission rates achieved during the compliance test. Therefore, the Ohio EPA considers this testing violation resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violation. 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.

Thank you for your cooperation in this matter. Please contact me at (419) 373-3136 if you have questions.

Sincerely,



Jay Liebrecht  
Division of Air Pollution Control

/cg

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