



**Environmental Protection Agency**

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

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

August 21, 2012

**CERTIFIED MAIL**

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

Dear Ms. Korek:

The stack test conducted on April 17, 2012, on Ohio EPA emissions unit Nos. P128 (Alloy Scrap Reclamation) and P129 (Alloy Scrap Reclamation Vacuum 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>	<b>Source Operating Rate</b>	<b>Maximum Source Operating Rate<sup>a</sup></b>
PM <sub>10</sub>	0.44 lb/hr	0.3 lb/hr	11,113 lbs batch (P128) 2 vacuum ports open (P129)	14,000 lbs/batch (P128) 2 vacuum ports open (P129)
Be	0.000043 lb/hr	0.03 lb/hr	11,113 lbs batch (P128) 2 vacuum ports open (P129)	14,000 lbs batch (P128) 2 vacuum ports open (P129)

\*Combined rate for P128 and P129.

<sup>a</sup> 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.

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Also, the following baghouse pressure drops were recorded during the test:

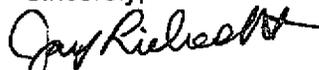
Test Run	Average Primary Differential Pressure (inches H <sub>2</sub> O)	Average Secondary Differential Pressure (inches H <sub>2</sub> O)
1 (April 17)	8.2	0.7
2 (April 18)	8.5	0.7
3 (April 19)	8.4	0.6

Emissions units P128 and P129 were being operated in violation of their allowable emissions rates for PM<sub>10</sub> established under Permit to Install (PTI) P0109658, issued March 12, 2012 violation of terms and conditions C.1.b.(1)(a), OAC rule 3745-31-05(D), and Ohio Revised Code 3704.05. However, on June 22, Materion applied for an administrative modification of the permit to raise the PM<sub>10</sub> allowable limit. On August 9, 2012, PTI P0110329 was issued final and raised the combined limits for emission units P128 and P129 above the actual emission rates achieved during the compliance test. Therefore, the Ohio EPA considers this testing violation resolved. 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.

With regards to the beryllium testing, the compliance demonstration is acceptable and satisfies the compliance demonstration requirements contained in the PTI. However the plant was operating at 79.4% of its maximum source operating rate. The Ohio EPA will conditionally accept these test results if the company agrees to notify our office within 14 days of exceeding the source operating rate achieved during the stack test by 10% or more. In addition, the company must agree to conduct a retest of the source within 45 days of exceeding the 10% threshold. Please send a written response within 14 days of this letter, stating whether or not the company agrees to the conditional acceptance of these test results.

If you have any questions regarding these matters please contact me at (419) 373-3136. Thank you.

Sincerely,



Jay Liebrecht  
Division of Air Pollution Control

/cg

pc: Jay Liebrecht, DAPC-NWDO  
Robert Teer, DAPC-NWDO  
Bruce Weinberg, DAPC-CO  
William MacDowell, US EPA, Region V  
DAPC, NWDO Stack File  
Follow-up File  
Certified Mail Receipt Number 70091410000118343549

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