



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

July 21, 2009

**RE: Washington County
Marietta Industrial Enterprises
Facility Id #:0684000148
EU #: P901 Mac Stack
EU #: P901 Std. Haven Stack
COMPLIANCE TEST
Notice of Violation – HPV GC8
CERTIFIED: 70063450000190558164**

Scott Elliott
Marietta Industrial Enterprises
Route 4, Box 179-1A
Marietta, OH 45750

Dear Mr. Elliott:

On February 10, and 11, 2009, Test Inc. performed a visible emissions and a particulate matter emission compliance test at Marietta Industrial Enterprises (MIE) 17943 State Route 7, Marietta on Emission Unit (EU) P901 Mac Stack & EU P901 Standard Haven Stack. The test was conducted to meet the requirements of the permit-to-install (PTI), Title V permit, and the Findings and Orders issued on 11/13/2008. Ohio EPA received the test report on March 25, 2009. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1 – 5, 9, & 22. The results of the test showed the source to be out of compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

MIE permit requirements and test results for EU P901 Mac Stack:

	Particulate Matter	Visible Emissions (Feed Hopper)	Visible Emissions (Entry Way 1)	Visible Emissions (Entry Way 2)	Visible Emissions (Stack)
Tested Emission Rate:	0.0027 gr/dscf (0.31 lbs/hr)	None	None	None	None
Allowable Emission Rate:	0.0020 gr/dscf (PTI P0103687 issued 10/2/2008) 2.2 lbs/hr – (Title V permit issued 7/12/02)	20% Opacity as a 3 minute average	20% Opacity as a 3 minute average	20% Opacity as a 3 minute average	No visible emissions
Source Operating Rate:	10.8 tons/hr (50 tons/hr Max)				
Isokinetic Rate:	Run #1 – 94.7%	Run #2 – 109.7%	Run #3 – 100.8%		
Test Pressure Drop	5.5 – 7 inches of H₂O	Allowable Psi. Drop	1-5 inches of H ₂ O (Title V permit issued 7/12/02)		

MIE permit requirements and test results for EU P901 Standard Haven Stack:

	Particulate Matter	Visible Emissions (Entry Way 1)	Visible Emissions (Entry Way 2)	Visible Emissions (Stack)
Tested Emission Rate:	0.0043 gr/dscf (0.97 lbs/hr)	None	None	None
Allowable Emission Rate:	0.0020 gr/dscf (PTI P0103687 issued 10/2/2008) 2.2 lbs/hr – (Title V permit issued 7/12/02)			
Source Operating Rate:	21.3 tons/hr (50 tons/hr Max)			
Isokinetic Rate:	Run #1 – 96.3%	Run #2 – 97.2%	Run #3 – 94.3%	
Test Pressure Drop	1 inch of H ₂ O	Allowable Psi. Drop	1-5 inches of H ₂ O (Title V permit issued 7/12/02)	

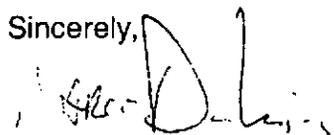
Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Christina Wieg.

Acceptance by Ohio EPA of a compliance plan and schedule does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Please refer any questions concerning the above requirements to Christina Wieg, Ohio EPA Southeast District Office, at (740) 380-5223.

Thank you for your cooperation in this matter.

Sincerely,



Marco Deshaies
 Environmental Specialist
 Division of Air Pollution Control

MD/mlm

cc: Christina Wieg, (Emissions Unit File Copy)
 Marco Deshaies, DAPC-SEDO w/ CETA summary attachment
 Lisa Holscher, U.S. EPA Region V
 Tom Kalman, DAPC/CO
 Jim Orleman, DAPC/CO
 Greg Bachmann, Ohio Attorney General, Env. Enf.
 Test Report File Copy

MIE permit requirements and test results for EU P904 MAC Stack:

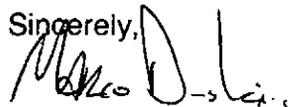
P904	Particulate Matter	Manganese Emissions (12% Mn slag)	Visible Emissions (Entry Way 1)	Visible Emissions (Entry Way 2)	Visible Emissions (Stack)
Tested Emission Rate:	0.0006 gr/dscf (0.97 lbs/hr)	0.021 mg/dscm / 0.00148 lbs/hr	None	None	None
Allowable Emission Rate:	0.003 gr/dscf (PTI P0103687 issued 10/2/2008) 2.2 lbs/hr – (Title V permit issued 7/12/02)	No set limit	20% Opacity as a 3 minute average	20% Opacity as a 3 minute average	No visible emissions
Source Operating Rate:	35.2 tons/hr (30 tons/hr Max)				
Isokinetic Rate:	Run #1 – 92.9%	Run #2 – 97.1%	Run #3 – 96.2%		
Test Pressure Drop	1 inch of H ₂ O				
Allowable Psi. Drop	1-5 inches of H ₂ O (Title V permit issued 7/12/02)				

It was observed during the performance test that the operating rate of both P926 & P904 exceeded the permitted allowable operating rates. P926 also operated the baghouse at a higher than allowable pressure drop. At this time, the agency is requesting you to update any effected PTI's and Title V applications to reflect the correct maximum operating rate and pressure drop range. Also, please submit to SEDO **within 15 days** of receipt of this letter an explanation of the increased operating rate and a clarification as to whether the EU's have been modified per OAC rule 3745-31-01.

All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to Christina Wieg, Ohio EPA Southeast District Office, at (740) 380-5223.

Thank you for your cooperation in this matter.

Sincerely,



Marco Deshaies
 Environmental Specialist
 Division of Air Pollution Control

MD/mlm

cc: Christina Wieg (Emissions Unit File Copy)
 Marco Deshaies, DAPC-SEDO w/ CETA summary attachment
 Jim Orleman, CO-DAPC
 Greg Bachmann, Ohio Attorney General, Env. Enf.
 Test Report File Copy



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

July 23, 2009

**RE: Washington County
Marietta Industrial Enterprises
Facility Id #:0684000148
EU #: P926 Ring Mill Stack
EU #: P904 MAC Stack
COMPLIANCE TEST
CERTIFIED: 70063450000190558225**

Scott Elliott
Marietta Industrial Enterprises
Route 4, Box 179-1A
Marietta, OH 45750

Dear Mr. Elliott:

On February 12, and 13, 2009, Test Inc. performed a particulate and visible emission compliance test at Marietta Industrial Enterprises (MIE) 17943 State Route 7, Marietta on Emissions Unit (EU) P926 Ring Mill Stack and EU P904 MAC Stack. The test was conducted to meet the requirements of the permit-to-install (PTI), Title V permit, and the Findings and Orders issued on 11/13/2008. Ohio EPA received the test report on March 25, 2009. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1 – 5, 9, 22 & 29. The results of the test showed the source to be in compliance with the applicable allowable emission rates, but MIE failed to operate the baghouse pressure drop within the required operating restriction.

MIE permit requirements and test results for EU P926 Ring Mill Stack:

P926	Particulate Matter	Visible Emissions (Entry Way 1)	Visible Emissions (Entry Way 2)	Visible Emissions (Stack)
Tested Emission Rate:	0.16 lbs/hr	None	None	None
Allowable Emission Rate:	1.80 lbs/hr – (Title V permit issued 7/12/02)	20% Opacity as a 3 minute average	20% Opacity as a 3 minute average	No visible emissions
Source Operating Rate:	10.1 tons/hr (5 tons/hr Max)			
Isokinetic Rate:	Run #1 – 92.9%	Run #2 – 97.1%	Run #3 – 96.2%	
Test Pressure Drop	5.5 – 7 inches of H₂O			
Allowable Psi. Drop	1-5 inches of H ₂ O (Title V permit issued 7/12/02)			