



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL # 91 7108 2133 3932 4449 7525**

September 1, 2009

Bob Feltz  
SHOWA Aluminum Corporation of America  
10500 O'Day-Harrison Road  
P.O. Box 10  
Mount Sterling OH 43143-9474

**Re: Notice of Violation (NOV)** based upon information received during a conference call on August 27, 2009  
Facility Premise # 0149000088

Dear Mr. Feltz:

On August 27, 2009, Ohio Environmental Protection Agency (EPA), Central District Office (CDO), Division of Air Pollution Control (DAPC) participated in a conference call with personnel from the SHOWA Aluminum facility located at 10500 O'Day-Harrison Road in Mount. Sterling, Ohio. The purpose of the conference call was to discuss issues associated with emissions unit (EU) P304 and to discuss applicability of 40 CFR Part 63, subpart MMM as related to activities at the facility.

Listed below is a "Finding" based upon the information provided during the conference call. The "Finding" is followed by "Violations" and "Requested Actions" necessary to address the stated findings and violations.

**Finding:** Excess organic compound (OC) emissions

During the August 27, 2009, conference call SHOWA personnel revealed that the new chip sprayer operation (P304) is and has been operating in violation of Ohio Administrative Code (OAC) rule 3745-21-07(G)(2). Specifically, it was revealed that P304 has produced OC emissions that exceeded quantities identified in the application for PTI P0104397 and that the EU has regularly exceeded the forty pound per day OC limitation. It was also revealed that the EU began exceeding this daily OC limitation on August 5, 2009.

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

**Violation:**

The discharge of OC emissions in excess of forty pounds per day is a violation of OAC rule 3745-21-07(G)(2). A violation of OAC rule 3745-21-07(G)(2) also constitutes a violation of ORC 3704.05(A), which states (in part):

*"No person shall cause, permit, or allow emission of an air contaminant in violation of any rule adopted by the director of environmental protection..."*

**Requested Action:**

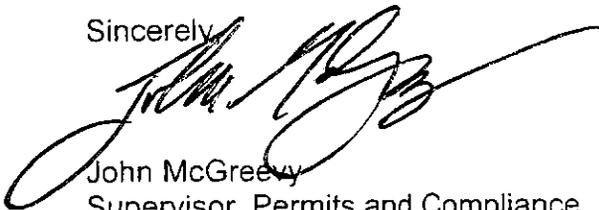
CDO requests that SHOWA prepare and submit, via Air Services, a PTI application that properly identifies the capabilities of EU P304 and addresses operational restrictions or control measures necessary to comply with all state and federal regulations. CDO requests that this application be submitted within 30 days from receipt of this letter.

In addition, CDO requests that any future violations be reported as soon as they are discovered.

Please note that Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the ORC. This letter or information submitted pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Benjamin Halton of my staff at (614) 728-3809.

Sincerely,



John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

c: Ben Halton, DAPC/CDO  
Adam Ward, DAPC/CDO  
John Paulian, DAPC/CO