



State of Ohio Environmental Protection Agency

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CERTIFIED MAIL # 91 7108 2133 3932 4450 4674

April 23, 2008

Mr. Werner Niehaus
V & S Columbus Galvanizing LLC
1000 Buckeye Park Road
Columbus, OH 43207

**Re: Notice of Violation
Particulate emitted in excess of 20% opacity from small kettle vent (P002)
Facility ID 0125040570**

Dear Mr. Niehaus:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC) staff observed visible particulate emissions (PE) from above the small galvanizing kettle vent fan at the rear of 1000 Buckeye Park Road on April 9 and 16, 2008. The recorded visible PE exceeded the allowable opacity limitation in OAC rule 3745-17-07(A)(1) and the hourly permit allowable for zinc emissions identified under Ohio EPA ID P002. Please review the findings of violation and respond to the action items requested below.

Current Permits

Ohio EPA DAPC issued air permit-to-install (PTI) 01-06661 on June 11, 1997, for the small hot dip zinc galvanizing kettle with five process tanks identified as emissions unit P002 that listed OAC rule 3745-17-07(A)(1) with an hourly emission limitation under OAC rule 3745-31-05(A)(3) of 0.15 lb zinc/hr to ensure compliance with the Ohio EPA toxic policy.

Ohio EPA DAPC issued an air permit-to-operate (PTO) for emissions units P002 on March 4, 2004, that listed the rule based limitation of 20% opacity, as a 6 - minute average during any consecutive 6-minute period.

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

Findings

CDO staff documented visible particulate emissions from a circular roof vent above the small hot dip galvanizing kettle (P002) during two 6-minute observation periods as recorded on the attached Method 9 forms during April 9 and April 16, 2008 visits to the facility. The visible particulate emissions recorded during these observations exceeded the allowable limitations the PTI and PTO issued to V & S Columbus Galvanizing for the small galvanizing kettle and violated OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(A)(3).

Violations

Columbus Galvanizing violated Ohio Revised Code (ORC) 3704.05(c) by violating the terms and conditions of a permit-to-install (PTI) and the permit-to-operate(PTO). Be advised, ORC rule 3704.05(c) states:

"No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Columbus Galvanizing also violated the Ohio Administrative Code (OAC) rule 3745-17-07(A)(1) by allowing visible PE vented from a stack to be emitted in excess of 20% opacity, as a 6-minute average during a consecutive 6-minute observation period.

Action for Remedy

Please submit a compliance plan and schedule with milestone date on which each will be achieved, the plan should be submitted within thirty (30) days of receipt of this letter:

Milestone

Completion Date

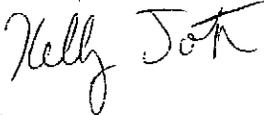
Compliance schedule and plan to eliminate visible PE from the small hot dip galvanizing kettle (P002) and return to compliance with Ohio Revised Code (ORC) 3704.05(c):

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline such penalties in this case will be made by Ohio EPA at a later date.

Mr. Werner Niehaus
V & S Columbus Galvanizing LLC
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Please submit the requested information within thirty (30) days of receipt of this letter. If you have any questions concerning the issues addressed in this letter, you may contact John Kirwin at (614) 995-0673.

Sincerely,



Kelly Toth
Environmental Supervisor
Division of Air Pollution Control
Central District Office

Enclosures: Method 9 observation forms

c: Adam Ward, Manager, DAPC/CDO
John Paulian, DAPC/CO
John Kirwin, DAPC/CDO

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