



**Environmental  
Protection Agency**

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

June 27, 2012

Re: Washington County  
Globe Metallurgical  
Facility ID # 0684000105  
Title V inspection-Warning Letter  
Non-HPV  
**Certified: 70102780000197044589**

Matt Greene  
Globe Metallurgical  
P.O. Box 157  
Beverly, OH 45715

**Subject: Summary of 2012 Globe Metallurgical Title V full compliance inspection**

Dear Mr. Greene:

On June 14, 2012, Jim Kavalec, Allison Lim, and I performed an inspection of the Globe Metallurgical facility in Waterford, Ohio. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations.

While at the facility, we met with you as the Environmental Manager for the Globe facility. During the visit we reviewed records and performed a visual inspection of the facility. Accompanying this letter is a copy of Ohio EPA's Facility Inspection Forms (Appendix N).

The facility's permitted significant emission units include the following:

Roadway and parking areas (F001),  
Raw material and waste storage piles (F002),  
Raw material unloading and handling (F003),  
Portable jaw crusher (F005),  
Primary slag crusher (F006),  
Furnace dust handling (F008 and F011),  
No. 1 shop hot metal casting (F009),  
No. 2 shop hot metal casting (F010),  
No. 1 shop alloy sizing line (P017),  
No. 1 shop plunging station (P023),  
No. 2 shop plunging station (P024),  
No. 1 ferrosilicon furnace (P902),  
No. 2 ferrosilicon furnace (P903),  
No. 3 ferrosilicon furnace (P904),  
No. 5 silicon metal furnace (P907),  
No. 7 silicon metal furnace (P908),  
Alloy loader (P910),  
No. 2 shop alloy sizing line (P911),  
Magnesium ferrosilicon alloying (P912), and  
Silicon fine sizing line (P933)

At the time of the inspection emission units F006, P024, P910, and P912 were not in operation. It should also be noted that the magnesium ferrosilicon alloying (P912) is now owned by Solsil Inc. and is currently not operational.

The Title V permit expired on October 24, 2006. A Title V renewal application was received by our office on April 17, 2006. The Title V application is currently pending.

Based on my inspection, file review, and reports submitted by Globe Metallurgical, the following issues have been discovered:

**P902 - No. 1 Ferrosilicon Furnace**  
**P903 - No. 2 Ferrosilicon Furnace**  
**P904 - No. 3 Ferrosilicon Furnace**

The above emissions units are subject to RACM under OAC rule 3745-17-08. During the site visit I observed fugitive emissions leaking from the top of the furnace and doors. The opacity did not appear to be a violation of OAC rule 3745-17-07. You mentioned that these emissions tend to occur when seals wear out around the furnace doors. It appears that these fugitive emissions could be defined as a violation of RACM. The facility should investigate the cause of the emissions and determine if these emissions could be prevented. **Please submit to the agency within 14 days of receiving this letter the cause for the visible emissions and corrective actions that were taken.**

**P902 - No. 1 Ferrosilicon Furnace**  
**P903 - No. 2 Ferrosilicon Furnace**  
**P904 - No. 3 Ferrosilicon Furnace**  
**P907 - No. 1 Ferrosilicon Furnace**  
**P908 - No. 2 Ferrosilicon Furnace**

During the inspection I observed visible emissions exiting both the #1 shop baghouse and the #2 shop baghouse. The Title V permitted allowable emissions limitation for these emission units controlled by these baghouses are as follows:

*"0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse or no visible emissions, whichever is less stringent."*

The emission unit has failed the limitation of no visible emissions (VEs) from the baghouse stacks. Therefore, the facility is obligated to demonstrate compliance with the 0.030 gr/dscf for this emission unit in order to demonstrate compliance.

Ohio Administrative Code rule 3745-77-07(A)(7) states that *"The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such*

*information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality."*

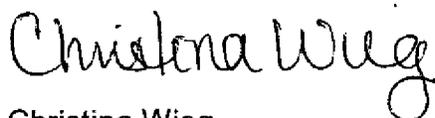
At this time, I am requesting that the facility submit to the agency a plan and schedule to address the VEs observed from both the #1 shop and the #2 shop baghouse in order for the agency to determine if further compliance demonstrations are required. In your response please include the following information:

- Documentation of inspections and maintenance that has occurred on the baghouses after the June 14, 2012 inspection;
- Explanation to the cause of the VEs observed from the baghouses during the June 14, 2012 inspection;
- The duration of the VEs event (estimated time it began and date and time that the VEs ceased);
- The last date of compliance stack testing for the sources served by the baghouses; and
- Any other corrective action that has occurred to-date.

**Please submit to the agency the above requested information within 14 days of receiving this letter.**

If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5223 or email [christina.wieg@epa.state.oh.us](mailto:christina.wieg@epa.state.oh.us). The assistance provided during the inspection is greatly appreciated.

Sincerely,



Christina Wieg  
Environmental Specialist III  
Division of Air Pollution Control  
Southeast District Office

CW/cs

cc: Dean Ponchak, DAPC/SEDO

Enclosure: Ohio EPA's Facility Inspection Form (Appendix N)