



REGIONAL AIR POLLUTION CONTROL AGENCY

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June 12, 2013

Certified Mail

Staker Alloys
Steve Howard
1075 James St.
Springfield, OH 45503

**RE: Visible Emissions from air emissions unit P001
Staker Alloys
Ohio EPA Identification Number 0812100596**

Dear Mr. Howard:

WARNING LETTER

During surveillance conducted on May 8, 2013, the Regional Air Pollution Control Agency (RAPCA) performed visible emissions observations (VEOs), using U.S. EPA Reference Method 9, on air emissions unit (EU) P001, secondary aluminum sweat furnace with afterburner, located at Staker Alloys (Staker), Ohio EPA Facility ID 0812100596, 1075 James St, Springfield, Ohio.

Permit to Install and Operate (PTIO) P0104369 was issued on February 24, 2009 for EU P001 establishing emissions limits and control requirements and monitoring, record keeping, and reporting requirements.

Visible Particulate Emissions

Pursuant to PTIO P0104369 Term and Condition C.1.b)(1)a., the visible particulate emissions shall not exceed 10 percent opacity, as a six minute average, except as provided by rule. OAC rule 3745-17-07(A)(1)(b) states that visible emissions may exceed the limit for not more than six consecutive minutes in any sixty minutes, but shall not exceed 60% opacity, as a six-minute average, at any time. The VEOs performed by RAPCA on May 8, 2013 resulted in the documentation two non-overlapping exceedances of the 10% opacity limitation, as a six-minute average, during a twenty minute observation period. While the first six-minute exceedance is exempt from the limit for the reasons given above, the second exceedance is considered a violation of PTIO P0104369 and Ohio Revised Code (ORC) 3704.05.

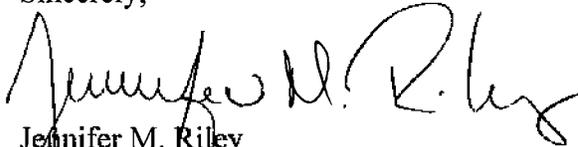
Afterburner Control Requirements

PTIO P0104369 and 40 CFR Part 63 Subpart RRR, Section 63.1505(f) requires that EU P001 be equipped with an afterburner with a design residence time of 0.8 seconds or greater. During the VEOs, RAPCA noted flames exiting EU P001's stack for approximately two minutes. The presence of flames at EU P001's stack exit calls to question the proper operation of the afterburner and requires additional information to be submitted.

This letter serves as official notification of the aforementioned visible emission limit violation for EU P001. RAPCA requests that Staker submit a compliance plan and schedule to address the excess VEOs from EU P001 and ensure ongoing compliance with the applicable limit. The plan shall also address the flames noted from EU P001's stack and how the apparent fire in the stack affects the function of the afterburner. Furthermore, Staker shall submit EU P001's operating records for May 8, 2013 including times the furnace was charged and both manually and data logger recorded furnace and afterburner temperatures. All requested information shall be submitted within fourteen days of receipt of this letter.

RAPCA appreciates Staker's prompt attention in addressing the visible emissions violations from EU P001. If you should have any questions please feel free to call me at 225-4438.

Sincerely,



Jennifer M. Riley
Air Pollution Control Specialist II
Abatement Unit

Cc Drew Lammers, Cohen Brothers
Brian Dickens, U.S. EPA (via e-mail)
Bruce Weinberg, Ohio EPA (via e-mail)
Jefferis Canan, RAPCA (via e-mail)