



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

June 27, 2013

Re: Washington County  
Globe Metallurgical  
Facility ID # 0684000105  
General Non-Compliance  
Non HPV

**Certified: 70122920000138146321**

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

**Subject: Notice of Violation concerning the June 20, 2013 site visit**

Dear Mr. Greene:

On June 20, 2013, Racheal Davies and I performed a site visit of the Globe Metallurgical facility in Waterford, Ohio. While at the facility, I met with you as the Environmental Manager for the Globe facility. During the site visit, I spoke to you concerning the current operations at the facility. We also conducted a walk-through of select areas of the facility.

Upon arrival at the site, I observed fugitive particulate emissions emanating from areas associated with the #2 shop baghouse which controls emissions from a number of sources including Furnace #5 (Emission Unit P907) and Furnace #7 (Emission Unit P908), and #2 Shop Plunging Station (P024). Emissions Units P907 and P908 were in operation at the time of the observation.

The source of the observed fugitive emissions associated with the #2 baghouse became apparent with further investigation. The access doors located near the stack section of the baghouse were open allowing particulate emissions to escape the control unit. In addition, multiple holes were observed on the duct work associated with the #2 shop baghouse on top of the #2 shop building and particulate emissions were escaping dampers associated with the baghouse. Therefore, the facility has failed to employ reasonable available control measures (RACM) and failed to minimize and eliminate emissions from the #2 shop emission units P907 and P908 by maintaining enclosures and venting particulate emissions to the baghouse. This is a violation of (Ohio Administrative Code) OAC rule 3745-17-08. **Please provide a narrative describing the origin and explanation of the visible emissions observed, the length of time the particulate emissions had been escaping, as well as corrective action to resolve the current issue and safeguards that will be implemented to prevent such occurrences in the future.**

During the site visit, I also requested to view the required visible emissions records associated with the #2 shop building. Title V Permit Terms Part A.III.1 for Emission Units P907 and P908 requires the facility to perform daily checks for any visible fugitive emissions from the emissions unit. Though the facility was recording that visible emissions were observed daily in the month of June, the records did not include the information that is required in Title V Permit Term Part A.III.1 (such as color of emissions, if the emissions were representative of normal operations, etc.). Therefore, the facility is not complying with the Title V Permit Term Part A.III.1 for Emission Units P907 and P908. **Please provide any corrective action that the facility is implementing to resolve the current issue and safeguards that are being implemented to prevent such occurrences in the future.**

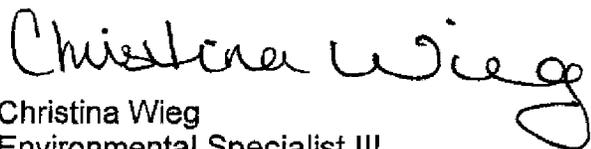
During the site visit, I also observed large quantities of visible emissions emanating from between the #1 shop building and the #1 sizing line. Upon investigation it was determined that an employee was "cleaning dust" off of equipment with forced air. The facility is located in an Appendix A area per OAC rule 3745-17-08 and is required to employ RACM for the purpose of minimizing and eliminating visible emissions of fugitive dust. This form of "cleaning" does not constitute RACM and is therefore a violation of OAC rule 3745-17-08. **Please provide an outline of how the facility will conduct needed cleaning in the future while minimizing and eliminating visible emissions of fugitive dust associated with this maintenance activity on the emissions units.**

Within 30 days of receipt of this letter, please submit the requested information as well as a plan and schedule to return the facility to compliance. The plan should include a time line for completing corrective actions and the corrective actions taken.

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

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.ohio.gov](mailto:christina.wieg@epa.ohio.gov). The assistance provided during the site visit was greatly appreciated.

Sincerely,



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

CW/cs

cc: Dean Ponchak, DAPC - SEDO