



Re: Ottawa County
 0362000009
 Stack Test
**Notice of Violation
 (NOV/Non-HPV)
 Return to Compliance**

June 4, 2013

CERTIFIED MAIL

Ms. Kim Korek
 Materion Brush, Inc.
 14710 West Portage River S Road
 Elmore, Ohio 43416

Dear Ms. Korek:

The stack test conducted on February 7th and 9th, 2012, on Ohio EPA emissions unit Nos. P115 (Decomposition Furnace No. 3), P116 (Reduction Furnace No. 1), P117 (Reduction Furnace No. 2), P118 (Wet Plant – Pebble Plant), and P122 (Decomposition Furnace No. 1) has been reviewed. The testing for FI, Be, and HCN was conducted in conformance with Ohio EPA methods and procedures. The testing for PM₁₀ was not witnessed by the Ohio EPA; however based on the information in the test report the testing appears to have been conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Pollutant Emission Rates
 (In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate
PM ₁₀	9.18 x 10 ⁻⁵ lb/hr	0.426 lb/hr
FI	0.072 lb/hr	0.138 lb/hr
Be	1.70 x 10 ⁻⁴ lb/hr	0.0084 lb/hr
HCN	0.24 lb/hr	0.10 lb/hr

(Process information has been omitted due to confidentiality issues).

Also, the following parameters were recorded during the test:

Wet ESP Secondary Voltage	48 kilovolts
Wet ESP Current	780 milliamps

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The emissions units were being operated in violation of their allowable emission rate for HCN established under Permit to Install (PTI) P0106917, issued November 23, 2010, violation of term and condition C.1.b.1.a, OAC rule 3745-31-05(D), and Ohio Revised Code 3704.05. However, on March 14, 2012, Materion applied for an administrative modification of the permit to raise the HCN allowable limit. On May 9, 2012, PTI P0109698 was issued final and raised the combined limits for emission units P114, P115, P116, P117, P118, and P122 above the actual emission rates achieved during this compliance test. Therefore the Ohio EPA considers this testing violation to be resolved. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

During the testing event, all of the sources were operating at less than 90% of their maximum source operating rates. Only two decomposition furnaces (P115 and P122) were operating for the test. Finally, the source operating rates for P115 and P122 were estimated using current to a screw conveyor and are not accurate numbers. However, all of these units were retested in February 2013 and will be tested again in June 2013. Therefore, subsequent testing will address the operating rate issues raised in this letter.

Thank you for your cooperation in this matter. Please feel free to contact this writer at (419) 373-3136 if you have questions or comments.

Sincerely,



Jay Liebrecht
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC, NWDO
DAPC, NWDO file
DAPC, NWDO Stack File
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