



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

Re: Putnam County
 0369000025
 Stack Test
**Notice of Violation
 (NOV/Non-HPV)
 Return to Compliance**

September 24, 2013

CERTIFIED MAIL

Mr. Rick Rupert
 PRO-TEC Coating Company
 500 County Road #5
 Leipsic, Ohio 45856

Dear Mr. Rupert:

The stack test conducted on April 18, 2013, on Ohio EPA emissions unit P001 (Continuous Annealing Furnace) was reviewed, and testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data were accurate:

**Critical Test Data
 (In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
NO _x	1.98 lbs/hr 0.024 lb/MMBtu	9.6 lbs/hr 0.10 lb/MMBtu	83.8 MMBtu/hr	96 MMBtu/hr
CO	13.07 lbs/hr	12.4 lbs/hr	83.8 MMBtu/hr	96 MMBtu/hr

Also, the following parameters were recorded during the test:

Parameter	Recorded Value
SCR Average Temperature	635.7°F
Urea Injection	7.0 gal/hr

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

The emissions unit was being operated in violation of its allowable emissions rate for CO. Failure to meet the allowable CO emission rate is a violation of Title V permit P0087443, issued November 6, 2008, OAC rule 3745-31-05(A)(3), and Ohio Revised Code 3704.05. It was found that two burners in the furnace were not working properly during the test. The burners were immediately repaired, and a subsequent check of emission levels that same day showed CO emissions within allowable limits.

The facility conducted additional compliance stack testing on May 29, 2013 on emissions unit P001, and these data have been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Critical Test Data
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate^b
CO	4.1 lbs/hr	12.4 lbs/hr	85.1 MMBtu/hr	96 MMBtu/hr
NO _x	1.74 lbs/hr 0.02 lb/MMBtu	9.6 lbs/hr 0.10 lb/MMBtu	85.1 MMBtu/hr	96 MMBtu/hr

Also, the following parameters were recorded during the test:

Parameter	Recorded Value
SCR Average Temperature	633.7°F
Urea Injection	6.9 gal/hr

The compliance demonstration is acceptable and satisfies the compliance demonstration requirements contained in the Title V operating permit. Therefore, the Ohio EPA considers the testing violation from the April 18, 2013 test to be resolved.

^b Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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Please note that the submission of the requested information to respond to this letter does not constitute 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 make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Thank you for your cooperation in this matter. Please feel free to contact this writer at (419) 373-3141 if you have questions or comments.

Sincerely,



Carol Norman, PhD, PE
Division of Air Pollution Control

/cg

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