



**Environmental  
Protection Agency**

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

Re: Hancock County  
Magnesium Elektron  
Premise # 0332010060  
Notice of Violation (NOV/HPV)

April 3, 2012

Ms. Connie Kempf, Plant Manager  
Magnesium Elektron  
115 Stanford Parkway  
Findlay, Ohio 45840

Dear Ms. Kempf:

This letter shall serve as a follow-up to the inspection conducted on February 2, 2012, at the Findlay, Ohio facility. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at this facility with respect to the rules and regulations of the Division of Air Pollution Control (DAPC). Accompanying me on the inspection was Ms. Alyse Johnson from the Northwest District Office (NWDO) of Ohio EPA.

Based on the review of the company files at NWDO, as well as observations during the inspection, the findings with regards to compliance status are summarized as follows:

1. Two degreasers, Emissions Units (EU) L001 and EU L002, that use trichloroethylene (TCE) are in operation at the facility. EU L001 and EU L002 have a Federally Enforceable Permit to Operate (FEPTIO) #P0087063, issued August 7, 1997, which includes requirements of 40 CFR Part 63, Subpart T for National Emission Standards for Halogenated Solvent Cleaning. Records indicate the facility stopped using TCE in L001 sometime in February 2011 and began using GenTech, a brominated solvent, as a replacement solvent. For EU L002, the facility has chosen to comply with the requirements of Subpart T by means of the Alternative Standards listed in §63.464.

This section requires, in §63.464 (a)(ii), that the facility "Ensure that the emissions from each solvent cleaning machine are equal to or less than the applicable emission limit presented in table 5 of this subpart as determined using the procedures in §63.465(b) and (c)." Table 5 lists a 3-month rolling average monthly emission limit of 150 kilograms/square meter/month ( $\text{kg}/\text{m}^2/\text{mo}$ ) for a batch vapor solvent cleaning machine.

Subpart §63.465(b) states

*“...A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions...”*

A review of the facility's records indicates that the solvent level was not returned to the fill line. A lesser amount of solvent was added in what would appear to be an attempt to keep the 3-month rolling average less than 150 kg/m<sup>2</sup>/mo. Had the solvent been returned to the same fill-line each month, the 3-month rolling average may have been higher than 150 kg/m<sup>2</sup>/mo. The recordkeeping procedures in §63.465(b) were not followed, and the calculation of the 3-month rolling average is not valid. Therefore, the facility is in violation of the recordkeeping requirements of 40 CFR Part 63, Subpart T.

**By May 4, 2012, the facility must provide written verification of how it intends to comply with the requirements of 40 CFR Part 63, Subpart T. If the facility chooses to comply with Subpart T via the requirements of §63.464, the facility must provide a detailed procedure as to how it will maintain records to meet these requirements.**

2. Open top vapor degreaser EU L004 was removed from the facility in the early 1990's, and non-VOC degreaser EU L003 was shutdown on July 11, 2003.
3. For coating lines EU K002 and EU K003, recordkeeping and reporting appear to be sufficient.

There are a significant number of other small air pollution sources at the facility. Several of these were previously permitted and are identified as follows:

- A. EU P003, the P.E. sheet grinding and cleaning, has particulate emissions and a fabric filter requirement for Best Available Technology (BAT) as listed in Permit to Install #03-3645 issued July 27, 1988.
- B. The facility installed a new sheet grinding and polishing line in 2008. After the inspection, calculations were provided that show VOC emissions from the new grinding and polishing line, but the basis for the calculations is unclear. DAPC will follow up with the facility's consultant on this and make a determination of whether a permit is necessary at a later date.

C. Four etchers currently exist at the facility. They are located in the Lab and are used in Quality Control procedures for the facility's products. Approximately one of one hundred plates is etched, or about one to two plates are etched in a day. The etchers are:

- EU P001, the Tasope etcher installed in 1988, was previously used for magnesium but is now used for zinc etching;
- EU P002, the Master etcher installed in 1988, is used for magnesium etching;
- A copper etcher; and
- A zinc etcher which was installed about three years ago but has not been used recently.

D. Four boilers/heating units were noted during the inspection:

- The Mechanical Room has EU B001, which is a Cleaver Brooks Model #GP-700-1 and is rated at 3.25 million Btu per hour (MMBtu/hr). It is listed in PTI # 03-3645 issued July 27, 1988.
- The Mechanical Room has another Cleaver Brooks, Model #3, rated at 2.6 MMBtu/hour and fired by natural gas.
- EU B002 is located in the Plate Polishing Area and is a make-up air unit, model Reznor-RDF-2-120, rated at 1.5 MMBtu/hr and fired by natural gas.
- The new grinding and polishing activity located in the room added in 2008 has a make-up air unit, Zinc with serial # 079531, rated at 4.104 MMBtu/hr and fired by natural gas.

The facility must submit either installation permit applications or renewal applications for all sources that do not qualify for a current OEPA exemption or de minimis status. At a minimum, renewal applications for EU's L001 and L002, K002 and K003, and P003 should be submitted. An application for the degreasers should be submitted separately since these units require a Federally Enforceable Permit to Install and Operate (FEPTIO). Renewal applications must be submitted electronically via Air Services.

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For all remaining air emissions sources at the facility that the company thinks are exempt from permitting or are de minimis, calculations or justification should be submitted to this office, in lieu of applications, to allow the Ohio EPA to confirm the facility's determination. For all air emissions sources that were previously permitted at the facility that now qualify as exempt or de minimis, the company can request that these permits be revoked through an official written request.

**Please submit all of the requested information by May 4, 2012.**

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 pursuant to ORC section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

Thank you for the courtesy extended during the site inspection. If you have any questions or comments about this letter, I can be contacted at (419) 373-3141 or by e-mail at [carol.norman@epa.state.oh.us](mailto:carol.norman@epa.state.oh.us).

Sincerely,



Carol Norman, PhD, PE  
Division of Air Pollution Control

/llr

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