



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 11, 2007

CERTIFIED MAIL

Diana Morris
Bekaert Contours
P.O. Box 608
Orrville, OH 44667

RE: Notice of Violation for Monitoring, Record Keeping and Reporting for P003 and P004; DAPC Facility ID 02-85-01-0331

Dear Ms. Morris:

Based upon a review of the reports submitted by the facility since May 8, 2006, Bekaert Contours is in violation of Ohio's air pollution regulations and needs to take the prompt actions listed below to minimize the duration of non-compliance. I encourage you to review this information carefully and contact me to discuss Bekaert Contours' plan for returning to compliance by May 18.

- 1. Failure to monitor the pressure differential across the scrubber controlling emissions unit P003 weekly, as required by Permit-to-Operate (PTO) issued July 29, 2003**

Bekaert Contours did not monitor the differential pressure across the scrubber for 15 weeks from July 2006 through March 2007. These violations were reported in the 3rd and 4th quarter 2006 and 1st quarter reports. In order to return to compliance, Bekaert Contours must:

- Immediately begin to keep the required weekly records.
- Provide this office a copy or a summary of the weekly records kept beginning with the issuance of the PTO on July 29, 2003, to the present.

- 2. Failure to monitor the liquid make-up rate of the scrubber controlling emissions unit P003 weekly, as required by PTO issued July 29, 2003**

Bekaert Contours did not monitor the liquid make-up rate of the scrubber for 15 weeks from July 2006 through March 2007. These violations were reported in the 3rd and 4th quarter 2006 and 1st quarter reports. In order to return to compliance, Bekaert Contours must:

- Immediately begin to keep the required weekly records.
- Provide this office a copy or a summary of the weekly records kept beginning with the issuance of the PTO on July 29, 2003, to the present.

3. Submitting the quarterly excursion reports for emissions unit P003 late, in violation of PTO issued July 29, 2003

Bekaert Contours did not submit the required quarterly reports within 30 days of the end of each quarter for reports 2nd quarter 2003 through 1st quarter 2006. These reports were eventually submitted May 8, 2006. To avoid additional violations, please submit all future required reports according to the deadlines established in Bekaert Contours' permits.

4. Failure to monitor the pressure differential pressure across the scrubber controlling emissions unit P004 each shift, as required by PTI 02-21943 issued June 6, 2006.

Bekaert Contours did not monitor the differential pressure across the scrubber sieve plates since the emissions unit was installed and commenced operation October 30, 2006. Instead, the differential pressure across the demister pad was monitored. However, the demister pad differential pressure was not monitored for 54 shifts from October 2006 to March 2007. These violations were reported in the 4th quarter 2006 and 1st quarter 2007 reports. In order to return to compliance, Bekaert Contours must:

- Install the appropriate pressure gauge to monitor the differential pressure across the scrubber sieve plates and begin to keep the records required by PTI 02-21943.
- Inform this office the date the installation is complete and the date records began.
- Provide this office a sample of the records kept.

5. Failure to monitor the liquid make-up rate of the scrubber controlling emissions unit P004 each shift, as required by PTI 02-21943 issued June 6, 2006.

Bekaert Contours did not monitor the liquid make-up rate for 54 shifts since the emissions unit was installed and commenced operation on October 30, 2006. These violations were reported in the 4th quarter 2006 and 1st quarter 2007 reports. In order to return to compliance, Bekaert Contours must:

- Immediately begin to keep the required weekly records.
- Provide this office a copy of the records kept.

DIANA MORRIS
MAY 11, 2007
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6. **Failure to record the results of weekly visible emissions checks for the stacks serving emissions unit P004, as required by PTI 02-21943 issued June 6, 2006.**

Bekaert Contours did not record the results of visible emissions checks on the stacks serving emissions unit P004 beginning the date the unit commenced operation on October 30, 2006. These violations were report on the semiannual report dated January 19, 2007.

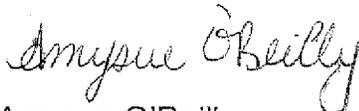
- Please submit the date that weekly visible emissions checks began.

Violating the terms and conditions of Bekaert Contours' permits is a violation of Ohio Revised Code 3704.05(C). In order to minimize the duration of non-compliance, please complete the corrective actions requested above and submit the information to my attention as quickly as possible, but **no later than June 11, 2007.**

Be advised that violations of state air pollution regulations are punishable by civil penalty of \$25,000 per violation. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

I encourage you to contact me directly at (330) 963-1298 by May 18 to discuss Bekaert Contours' plan for compliance.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

ec: Ed Fasko, Ohio EPA, NEDO, DAPC
Dennis Bush, Ohio EPA, NEDO, DAPC
Bob Princic, Ohio EPA, NEDO, DAPC

cc: Tom Kalman, Ohio EPA, Central Office, DAPC
Lisa Holscher, U.S. EPA, Region 5