



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 29, 2007

RE: NOTICE OF VIOLATION OF PERMIT TERMS
(FACILITY ID: 02-50-11-1058)

CERTIFIED MAIL

Ms. Margaret Sebastian
GLG Industries, LLC
3840 Villa Rosa Dr.
Canfield, OH 44406

Dear Ms. Sebastian:

The purpose of this letter is to provide a follow-up to the November 13, 2007, site visit of GLG Industries (GLG) performed in response to a visible emissions complaint. I appreciate the efforts of Bob Samargia and your staff in providing all requested information during the visit. This letter serves to notify you that GLG is operating in violation of the terms and conditions of its permit-to-install (PTI) #02-21869 issued April 11, 2006, as well as Ohio Revised Code (ORC) 3704.05(C) and (G).

During the visit, it was noted that the pressure drop on the indoor torch cutting baghouse was reading out of its allowable range. The baghouse was operating in violation of term II.B.1 of the terms and conditions for P001 in the PTI, as well as ORC 3704.05(C) and (G). This permit term requires that "the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation." The baghouse was reading approximately 9.8 inches at 10 a.m. on November 13, 2007.

Additionally, fugitive particulate emissions were noted coming from a connector and the opening at the bottom of the baghouse, and also coming from one of the roof vents on the building surrounding the torch cutting operation. The emissions from the bottom of the baghouse should be immediately corrected by properly sealing the connector, and also by reducing the drop height from the opening to the dust collection bin below the baghouse. The fugitive particulate emissions coming from the roof vent are due to poor capture of the particulate emissions by the hoods enclosing the cutting torches. This is a violation of term II.B.2 of the terms and conditions for P001 in the PTI, as well as ORC 3704.05(C) and (G). This permit term requires that "the control system shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate

MS. MARGARET SEBASTIAN
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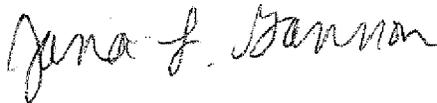
emissions at the point(s) of capture to the extent possible with good engineering design." As discussed with Mr. Samargia, this problem might be eliminated by either extending the hoods to enclose more of the torching operation, or increasing the flow of the air being vented to the baghouse, or a combination of both. These are recommendations, and not all-inclusive options.

Please submit a plan to return to compliance with the terms of the PTI and ORC 3704.05(C) and (G) **within 14 days of receipt of this letter.**

The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06 or for USEPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date. Failure to respond to this request in the requested time frame can result in a referral to the Central Office of Ohio EPA for the appropriate enforcement action.

Should you have any questions regarding this matter, please feel to call me at (330) 963-1261.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control

JLG:bo

ec: Dennis Bush, DAPC-NEDO
Ed Fasko, DAPC-NEDO

cc: Bob Princic, DAPC-NEDO
Tom Kalman, DAPC-CO
Lisa Holscher, USEPA Region V