



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

October 15, 2008

**NOTICE OF VIOLATION
HIGH PRIORITY FACILITY GC7**

CERTIFIED MAIL

Mr. Randolph Turk, Site Manager
BASF Catalysts LLC
120 Pine Street
Elyria, OH 44035

RE: Division of Air Pollution Control Compliance Evaluation for the operations located at 120 Pine Street, Elyria, Ohio - DAPC Facility ID No. (02-47-04-0195)

Dear Mr. Turk:

This letter serves as a follow-up to our 9/04/08 and 9/17/08 inspections and provides you with information on the Division of Air Pollution Control (DAPC) program requirements. I appreciate the time and courtesy shown by Jeff Baker, Senior Environmental Specialist, and Mike Barron, Reliability Engineer, to me during my inspection.

No air pollution control equipment operating parameter monitoring records nor visible emissions checks of the control equipment egress were available for (P105) gravity bed separator. Revised record keeping procedures are requested in item nos. 1 and 2 of this letter. A response to the Ohio EPA Northeast District Office in Twinsburg, Ohio is requested by **11/07/08**.

(P105) Gravity bed separator (for metal catalysts), E-107, with a baghouse

No baghouse operating parameter monitoring records were included with the hard copy records provided on 9/04/08, which is a violation of term A.III.1. in Permit-to-Install (PTI# 02-14641). No daily visible emissions checks of the baghouse egress were included in the electronic records of the visible particulate emissions checks, which is a violation of A.III.2 in PTI 02-14641.

1. Please revise the record keeping procedures and the electronic spreadsheet(s) to include a daily reading of the differential pressure drop, in inches of water ("H₂O") for future operating days. Likewise, please revise the record keeping procedures to include a daily observation of the baghouse stack(s) to check for visible particulate emissions for future operating days. If the production equipment is not operating, then it is recommended that a comment be made regarding the operational status which is a procedure that is already employed for many other emissions units' records.

MR. RANDOLPH TURK, SITE MANAGER
OCTOBER 15, 2008
PAGE 2

2. Please submit a copy of the revised record(s) and any related spreadsheet(s) to our office.

It is noted that the recommendation for a draft Title V operating permit renewal includes daily record keeping of the baghouse pressure drop and daily records of the visible emissions check.

(P077) P&S belt dryer (for metallic catalyst products) in HC-11, E-84

A 10/02/08 BASF Catalyst e-mail from Jeff Baker stated, "The stick former, the dryer and the discharge conveyor (associated with P077) were cleaned and removed for scrap steel recycle. This was completed June 15, 2008."

The facility profile of our permit and reporting system, STARS2, has been updated to note the shutdown date for P077.

General Reporting Requirements

3. Beginning with the fourth quarter of 2008 deviation report, all reports, permit applications, fee emissions reports and certification of compliance with a Title V operating permit must be electronically filed via the e-Business Center.
4. The second semiannual 2008 report for the July 1 – December 31 period must include a description of the aforementioned monitoring and record keeping deviations at (P105) and is due by 1/31/09.
5. You must include all non-insignificant emissions units in an updated facility profile via the e-Business program prior to submitting the next (fee) emissions report, due on 4/30/09 for emissions during the 2008 calendar year.

Our brief review of the facility profile shows that most non-insignificant emissions units are listed. However, a number of control equipment devices and several egress points are not associated with a particular emissions unit(s).

A brief information sheet about the e-Business Center was given to a BASF Catalyst representative. Our website is being updated frequently. It is recommended that you view information at <http://www.epa.state.oh.us/dapc/airservices/>.

Status of Application for Renewal Title V Operating Permit (# P0085293)

Our Columbus office made a preliminary review of the recommended permit terms and requested revisions. The revisions were made and sent to our Columbus office in 01/08. In order to accommodate changes to the STARS2 permitting and reporting system, the electronic permit terms were re-formatted to a Word document. The Northeast District Office must also re-format the Statement of Basis table to a Word document. We will remove permit terms for P077, which was shutdown. Hopefully, the draft Title V operating renewal permit will be issued in 12/08.

MR. RANDOLPH TURK, SITE MANAGER
OCTOBER 15, 2008
PAGE 3

The receipt of the information requested in item nos. 1 and 2 and any other items that you wish, is requested by **11/07/08**. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency. Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

- cc: Bob Prinicic, DAPC, Ohio EPA, NEDO
Tom Kalman, Enforcement Section, DAPC, Ohio EPA, CO
Lisa Holscher, U.S. EPA, Region V
- ec: Jeff Baker, BASF Catalysts LLC – Elyria, OH with electronic enclosure
Richard Mirth, BASF Catalysts LLC – Erie, PA with electronic enclosure