



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 30 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matthew Greene
Environmental, Health, and Safety Corporate Manager
Globe Metallurgical, Inc.
County Route 32
Waterford, Ohio, 45768

Dear Mr. Greene:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to Globe Metallurgical, Inc.'s facility at County Route 32, Waterford, Ohio (you or the facility). EPA has determined that you are in violation of the Standards of Performance for Ferroalloy Production Facilities, the facility's Title V Permit and Permit to Install, and the Ohio State Implementation Plan (SIP). Violations of the Standards of Performance for Ferroalloy Production Facilities constitute violations of Section 111 of the Act. Violations of the Ohio SIP and the Permit to Install constitute violations of Section 110 of the Act. Violations of a Title V Permit constitute violations of Section 503 of the Act.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for the refinery's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contacts in this matter are Virginia Galinsky, Environmental Engineer, Alexandra Letuchy, and Terry Branigan, Associate Regional Counsel. You may call them at (312) 353-2089, (312) 886-6035 and (312) 353-4737, respectively, if you wish to request a conference. You should make the request for a conference within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



George T. Czerniak
Director
Air and Radiation Division

Enclosure

cc: Bob Hodanbosi, Ohio Environmental Protection Agency

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Globe Metallurgical, Inc.
Waterford, Ohio**

Proceedings Pursuant to
the Clean Air Act
42 U.S.C. § 7401 *et seq.*

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**NOTICE AND FINDING OF
VIOLATION**

EPA-5-15-OH-20

NOTICE AND FINDING OF VIOLATION

Globe Metallurgical, Inc., (Globe) owns and operates a ferroalloy production facility at County Road 32, Waterford, Ohio (facility). Operations at the facility include several electric arc furnaces and their associated air pollution control devices.

The U.S. Environmental Protection Agency is sending this Notice and Finding of Violation (NOV/FOV or Notice) to notify the facility that we have found violations of the General Provisions to the Standards of Performance for New Stationary Sources (NSPS), the NSPS for Ferroalloy Production Facilities, the facility's Title V Permit and Permit to Install, and the Ohio State Implementation Plan (Ohio SIP).

Clean Air Act

1. Section 111 of the Clean Air Act (the Act), 42 U.S.C. § 7411, authorizes EPA to promulgate regulations establishing the NSPS.

NSPS General Provisions

2. The Administrator promulgated the General Provisions to the Standards of Performance for New Stationary Sources, codified at 40 C.F.R. §§ 60.1 – 60.19 (NSPS Subpart A) on November 17, 1975 (40 Fed. Reg. 53346).

3. 40 C.F.R. § 60.7(a)(4) provides that “[a]ny owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows: (4) A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in §60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date

of the change. The Administrator may request additional relevant information subsequent to this notice.”

4. 40 C.F.R. § 60.8(a) provides that “[e]xcept as specified in paragraphs (a)(1),(a)(2), (a)(3), and (a)(4) of this section, within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, or at such other times specified by this part, and at such other times as may be required by the Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Administrator a written report of the results of such performance test(s).”

5. 40 C.F.R. § 60.14(a) provides that “[e]xcept as provided under paragraphs (e) and (f) of this section, any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.”

Standards of Performance for Ferroalloy Production Facilities

6. EPA promulgated the Standards of Performance for Ferroalloy Production Facilities (NSPS for Ferroalloy Production Facilities), effective May 4, 1976. See 41 Fed. Reg. 18501. The NSPS for Ferroalloy Production Facilities is codified at 40 C.F.R. Part 60, Subpart Z.

7. 40 C.F.R. § 60.260(a) provides that the provisions of Subpart Z “are applicable to the following affected facilities: Electric submerged arc furnaces which produce silicon metal, ferrosilicon, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, silicomanganese, ferromanganese silicon, or calcium carbide; and dust-handling equipment.”

8. 40 C.F.R. § 60.260(b) provides that “[a]ny facility under paragraph (a) of this section that commences construction or modification after October 21, 1974, is subject to the requirements of this subpart.”

9. 40 C.F.R. § 60.264(a) provides that “[t]he owner or operator subject to the provisions of this subpart shall install, calibrate, maintain and operate a continuous monitoring system for measurement of the opacity of emissions discharged into the atmosphere from the control device(s).”

10. 40 C.F.R. § 60.262(a)(1) provides that “[o]n and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any electric submerged arc furnace any gases which... [e]xit from a control device and contain particulate matter in excess of 0.45 kg/MW-hr (0.99 lb/MW-hr) while silicon metal, ferrosilicon, calcium silicon, or silicomanganese zirconium is being produced.”

Prevention of Significant Deterioration of Air Quality

11. Part C of Title I of the Act, 42 U.S.C. §§ 7470-7492, sets forth requirements for the prevention of significant deterioration (PSD) of air quality in those areas designated as either attainment or unclassifiable for purposes of meeting the National Ambient Air Quality Standards (NAAQS). These requirements are designed to protect public health and welfare, to assure that economic growth will occur in a manner consistent with the preservation of existing clean air resources, and to assure that any decision to permit increased air pollution is made only after careful evaluation of all the consequences of such a decision and after public participation in the decision making process. *See* 42 U.S.C. § 7470. These provisions are referred to as the Clean Air Act's "PSD Program."

12. Part C of Title I of the Act and the regulations implementing Part C, at 40 C.F.R. § 52.21, prohibit a major stationary source from constructing a modification without first obtaining a PSD permit, if the modification is major in that it will result in a significant net increase in emissions of a regulated pollutant, and if the source is located in an area which has achieved the NAAQS for that pollutant. Part C and its implementing regulations further require that a source subject to PSD regulations install best available control technology (BACT).

13. Sections 110(a) and 161 of the Act, 42 U.S.C. 7410(a) and 7471, require states to adopt a SIP that contains emission limitations and such other measures as may be necessary to prevent significant deterioration of air quality in areas designated as attainment or unclassifiable.

14. A state may comply with Sections 110(a) and 161 of the Act by having its own PSD regulations approved as part of its SIP by EPA, provided they are at least as stringent as those set forth at 40 C.F.R. § 51.166.

15. If a state does not have a PSD program that has been approved by EPA and incorporated into the SIP, the federal PSD regulations set forth at 40 C.F.R. § 52.21 may be incorporated by reference into the SIP. 40 C.F.R. § 52.21(a).

16. On May 1, 1980, EPA disapproved Ohio's proposed PSD program and incorporated by reference the PSD regulations of 40 C.F.R. § 52.21(b) through (w) into the Ohio SIP. EPA also delegated to Ohio the authority to implement the federal PSD program incorporated into the Ohio SIP. 46 Fed. Reg. 9580 (January 29, 1981). *See* 40 C.F.R. § 52.1884.

17. On October 10, 2001, EPA conditionally approved revisions to the Ohio SIP to incorporate Ohio's PSD program, effective October 10, 2001. 66 Fed. Reg. 51570 (October 10, 2001). On January 22, 2003, EPA granted final approval for Ohio's PSD program, effective March 10, 2003. 68 Fed. Reg. 2909 (January 22, 2003). On February 25, 2010, EPA partially approved revisions to Ohio's PSD program, effective March 29, 2010. 75 Fed. Reg. 8496 (February 25, 2010). On February 20, 2013, EPA partially approved revisions to Ohio's PSD program, effective March 22, 2013. 78 Fed. Reg. 11748 (February 20, 2013).

18. Ohio Administrative Code (OAC) Rule 3745-31-01(FFFFF)(2) of the federally-approved Ohio SIP provides that, for stationary sources located in an attainment area, "regulated

NSR pollutant” includes, among other things, any pollutant for which a national ambient air quality standard has been promulgated and any constituents or precursors for such pollutants.

19. OAC Rule 3745-31-01(LLI)(2)(b) of the federally-approved Ohio SIP provides that “[f]or stationary sources located in an attainment area for a given regulated air pollutant”, a “major stationary source” is considered to be “any stationary source that emits, or has the potential to emit, two hundred fifty tons per year or more of any regulated [new source review] NSR pollutant.”

20. OAC Rule 3745-31-01(JJJ) of the federally-approved Ohio SIP defines “major modification” as: “[a]ny physical change in or change in the method of operation of a major stationary source that would result in: (1) A significant emissions increase of a regulated NSR pollutant; and (2) A significant net emissions increase of that pollutant from the major stationary source... (4) Regardless of any such preconstruction projections, a major modification results if the NSR project causes a significant emissions increase and a significant net emissions increase.”

21. OAC Rule 3745-31-01(JJJ)(4)(a) of the federally-approved Ohio SIP provides that, for NSR projects that only involve modification of an existing emissions unit, “[a] significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the projected actual emissions and the baseline actual emissions, for each existing emissions unit, equals or exceeds the significant amount for that pollutant.”

22. OAC Rule 3745-31-01(TTT) of the federally-approved Ohio SIP defines “net emissions increase” as “the amount by which the sum of the following, except as limited by paragraph (TTT)(3) of this rule, exceeds zero:

- (1) Any increase in emissions from a particular physical change or change in the method of operation at a stationary source as calculated under this rule; and
- (2) Any other increases and decreases in actual emissions at the stationary source that are contemporaneous with the particular change and are otherwise creditable. Baseline actual emissions for calculating increases and decreases under paragraph (TTT) of this rule shall be determined as provided in paragraph (O) of this rule, except that paragraphs (O)(1)(c) and (O)(2)(d) of this rule shall not apply.”

23. OAC Rule 3745-31-01(MMMMM) of the federally-approved Ohio SIP defines “significant,” in reference to a net emissions increase, as any increase in SO₂ of 40 tons or more per year.

24. OAC Rule 3745-31-12(C)(4) and (5) of the federally-approved Ohio SIP require that a source submit the air quality impact(s) of a major modification.

25. OAC Rule 3745-31-13(A) of the federally-approved Ohio SIP provides that no major modification shall begin actual construction unless, at a minimum, the requirements of OAC Rules 3745-31-01 through 3745-31-20 have been met and the stationary source has obtained a valid permit to install from the Ohio Environmental Protection Agency (Ohio EPA).

26. OAC Rule 3745-31-15(D) of the federally-approved Ohio SIP requires a major modification to apply BACT for each regulated pollutant for which it would result in a significant net emissions increase at the source.

Title V

27. Title V of the Act, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for major sources of air pollution.

28. In accordance with Section 502(b) of the Act, 42 U.S.C. § 7661a(b), EPA promulgated regulations establishing the minimum elements of a Title V permit program to be administered by any air pollution control agency. See 57 Fed. Reg. 32250 (July 21, 1992). Those regulations are codified at 40 C.F.R. Part 70.

29. Section 502(d) of the Act, 42 U.S.C. § 7661a(d), provides that each state must submit to EPA a permit program meeting the requirements of Title V.

30. On August 15, 1995, EPA approved the State of Ohio's operating permit program (OAC Rule 3745-77) with an effective date of October 1, 1995. See 60 Fed. Reg. 42045 (August 15, 1995).

31. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit.

32. 40 C.F.R. § 70.6(b)(1) provides that all terms and conditions in a Title V permit are enforceable by EPA.

Permit to Install

33. Effective March 10, 2003, EPA approved OAC 3745-31-02 as part of the federally-enforceable Ohio SIP. 68 Fed. Reg. 29009.

34. OAC Rule 3745-31-05 authorizes the Ohio EPA to, among other things, issue federally-enforceable Permits-to-Install (PTI) with such terms and conditions as are necessary to ensure compliance with applicable laws and to ensure adequate protection of environmental quality.

Permitting Background

Title V Permit

35. The Ohio EPA issued a Title V Permit to the facility on January 30, 2002 (Title V Permit).

36. The significant emission units and associated emission control equipment in the Title V Permit relevant to this NOV/FOV are:

Emission Unit ID	Emission Unit Name	Control Device
F005	Portable Jaw Crusher	Filter Baghouse
P017	No. 1 Shop Alloy Sizing Line	No. 1 Shop Sizing Line Baghouse
P023	No. 1 Shop Plunging Station	No. 1 Shop Baghouse
P902	No. 1 Ferrosilicon Furnace	
P903	No. 2 Ferrosilicon Furnace	
P904	No. 3 Ferrosilicon Furnace	
P907	No. 5 Silicon Metal Furnace	No. 2 Shop Baghouse
P908	No. 7 Silicon Metal furnace	
P910	Alloy Loader (DOW Loader)	Loader Baghouse
P911	No. 2 Shop Alloy Sizing Line	Filter Baghouse

37. Condition A.II.1 for Emission Unit P017 states that “[t]he pressure drop across the baghouse shall be maintained within the range of 1 and 7 inches of water while the emissions unit is in operation.”

38. Condition A.I.1. for Emission Units P023, P902, P903, P904, P907, and P908 states that emissions from each unit shall not exceed “20% opacity as a 3-minute average for fugitive emissions.”

39. Condition A.I.1. for Emission Units P023, P902, P903, P904, P907, and P908 states that emissions from each unit shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases from the control device or no visible [particulate] emissions, whichever is less stringent.

40. Condition A.I.2. for Emission Unit P023 states that “[t]he permittee shall employ reasonably available control measures on the #1 shop magnesium plunging station for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain enclosures and vent emissions to a fabric filter baghouse to ensure compliance.”

41. Condition A.I.2. for Emission Units P902, P903, P904, P907, and P908 states that “[t]he permittee shall employ reasonable available control measures on all charging, melting and tapping operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall maintain enclosures and vent particulate emissions to the baghouse to ensure compliance.”

42. Condition A.II.1 for Emission Units P023, P902, P903, P904, P907, and P908 requires that “[t]he pressure drop across the baghouse shall be maintained within the range of 5 and 15 inches of water while the emissions unit is in operation.”

43. Condition A.III.1 for Emission Unit P023 states that “[t]he permittee shall perform daily checks, while the equipment is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit.”

44. Condition A.III.1 for Emission Units P902, P903, P904, P907, and P908 states that “[t]he permittee shall perform daily checks, while the equipment is in operation and when

the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit and visible particulate emissions from the stack serving this emissions unit.”

45. For Emission Units P023, P902, P903, P904, P907, and P908, Condition A.III.1 requires that the presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

46. Condition A.II.1 for Emission Unit F005 states that “[t]he pressure drop across the baghouse shall be maintained within the range of 4 to 6 inches of water while the emissions unit is in operation.”

47. Condition A.II.1 for Emission Unit P910 states that “[t]he pressure drop across the baghouse shall be maintained within the range of 1 to 4 inches of water while the emissions unit is in operation.”

48. Condition A.II.1 for Emission Unit P911 states that “[t]he pressure drop across the baghouse shall be maintained within the range of 1 to 7 inches of water while the emissions unit is in operation.”

PTI 06-08118

49. The Ohio EPA issued PTI 06-08118 to the facility on August 1, 2006.

50. The significant emission unit and associated emission capture equipment in PTI 06-08118 relevant to this NOV/FOV is emission unit F008, Shop #1 Fume Handling System, controlled by No. 1 Shop Baghouse.

51. Condition A.I.1. for Emission Unit F008 states that particulate emissions from the stack “shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases from the control device or there shall be no visible emissions, whichever is less stringent.”

PTI 06-08119

52. The Ohio EPA issued a PTI 06-08119 to the facility on August 1, 2006.

53. The significant emission unit and associated emission capture equipment in PTI 06-08119 relevant to this NOV/FOV is emission unit F011, Shop #2 Fume Handling System, controlled by No. 2 Shop Baghouse.

54. Condition A.I.1. for Emission Unit F011 states that particulate emissions from the stack “shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases from the control device or there shall be no visible emissions, whichever is less stringent.”

Factual Background

55. Globe owns and operates a ferroalloy production facility at County Road 32, Waterford, Washington County, Ohio (the facility). The facility includes several emission units, including electric arc furnaces and sizing lines.

56. At all times relevant to this NOV/FOV, Washington County has been designated attainment or unclassifiable for the 1971 SO₂ standard. Effective October 4, 2014, the portion of Washington County that includes Waterford Township, where Globe is located, is designated nonattainment for the 2010 SO₂ NAAQS standard (see 78 F.R. 47203).

57. Globe is a major source under the PSD Program because it emits more than 250 tons per year of a regulated NSR pollutant.

58. On August 14, 2013, EPA conducted an inspection at the facility.

59. On March 5, 2014, EPA issued an information request to Globe pursuant to Section 114 of the Act, 42 U.S.C. § 7414.

60. Globe provided a response to the information request on June 19, 2014.

NSPS for Ferroalloy Production Facilities

61. On or around April 2013, Globe rebuilt electric arc furnace (EAF) #5 to increase the diameter of the furnace shell with the stated intent of using larger electrodes to increase the furnace load and allow production of silicon alloys. The increased furnace load has resulted in an increase in the emission rate of PM from the furnace.

62. The 2013 rebuild of EAF #5 constitutes a modification under NSPS.

63. Globe has not submitted any notifications related to the rebuild and enlargement of EAF #5, has not conducted a performance test, and has not installed a continuous opacity monitor.

PSD Requirements (Ohio SIP)

64. The April 2013 rebuild of EAF #5 constitutes a modification to an air pollutant source under the PSD requirements in the federally-approved Ohio SIP.

65. The April 2013 rebuild of EAF #5 resulted in an emissions increase and a net emissions increase of SO₂ above the significance threshold, thus making the project a major modification under the PSD requirements in the federally-approved Ohio SIP.

66. Globe has not applied for or obtained any permits containing the necessary PSD requirements (including installation of BACT), conducted any modeling, or undergone any other sort of pre-construction review for this major modification.

Title V Permit

Pressure Drop

67. On 73 days between March 2010 and April 2014, Globe operated the No. 1 Shop Baghouse outside the permitted pressure drop range of 5.0 and 15.0 inches of water while associated emissions units were in operation.

68. On 345 days between July 2011 and April 2014, Globe operated the No. 1 Shop Sizing Line Baghouse outside the permitted pressure drop range of 1.0 and 7.0 inches of water while associated emissions units were in operation.

69. From July 2010 through December 2013, Globe regularly operated the Filter Baghouse for Emission Unit F005 outside the permitted pressure drop range of 4 to 6 inches of water while associated emissions units were in operation.

70. From July 2010 through December 2013, Globe regularly operated the Loader Baghouse outside the permitted pressure drop range of 1 to 4 inches of water while associated emission units were in operation.

71. From July 2010 through December 2013, Globe regularly operated the Filter Baghouse for Emission Unit P911 outside the permitted pressure drop range of 1 to 7 inches of water while the emission units were in operation.

Reported Visible Emissions from Control Device

72. Globe reported that it operated with observable visible particulate emission from control devices for the following number of days in each identified quarter:

Emission Unit	Control Device	Dates	Number of Days
P023/P902/P903/P904	No. 1 Shop Baghouse	1H 2010	9
		2H 2010	9
		1H 2011	7
		2H 2011	4
		1H 2012	7
		2H 2012	9
		2H 2013	9
		P907/P908	No. 2 Shop Baghouse
1H 2011	11		

		1H 2012	5
		2H 2012	25
		1H 2013	1
		2H 2013	32

73. Many of Globe's completed logs kept pursuant to Condition A.III.1 of Globe's Title V Permit for Emission Unit P023, P902, P903, P904, P907, and P908 did not note color of emissions, whether the emissions were representative of normal operations, if the emissions were not representative of normal operations, the reason for the abnormal emissions, and the total duration of any visible emission incident.

Opacity Exceedances

74. Globe provided a Method 9 reading for January 20, 2011 for Emission Unit P902. The highest three-minute average opacity reading was 20.4%.

75. On December 9, 2014, EPA conducted opacity readings at the No. 1 Shop building from 2:20 to 2:37 PM and from 2:38 to 2:52 PM. During the first set of readings, there were 49 three-minute average readings that exceeded 20%. During the second set of readings, there were 14 three-minute average readings that exceeded 20%.

PTI 06-08118

76. The table below identifies the number of days in each semiannual time period that visible particulate emissions at Emission Unit F008 from No. 1 Shop Baghouse were observed and reported by Globe.

Dates	Number of Days
1H 2011	7
2H 2011	3
1H 2012	4
2H 2012	9
2H 2013	3

PTI 06-08119

77. The table below identifies the number of days in each semiannual time period that visible particulate emissions at Emission Unit F011 from No. 2 Shop Baghouse were observed and reported by Globe.

Dates	Number of Days
1H 2010	1
1H 2011	4
1H 2012	2
2H 2012	12
1H 2013	1

Violations

NSPS for Ferroalloy Production Facilities

78. By failing to submit any notification of the rebuild of EAF #5, Globe has violated 40 C.F.R. § 60.7(a)(4).

79. By failing to conduct a performance test within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of EAF #5, Globe has violated 40 C.F.R. § 60.8.

80. By failing to install, calibrate, maintain, and operate a continuous monitoring system for measurement of the opacity from the baghouse controlling EAF #5, Globe has violated 40 C.F.R. § 60.264(a).

PSD Requirements (Ohio SIP)

81. Globe's failure to apply BACT to control emissions of SO₂ from EAF #5 prior to commencement of operation after construction of a major modification at EAF #5 is a violation of the federally-approved Ohio SIP Rule at OAC 3745-31-15(D).

82. Globe's failure to obtain a valid Ohio EPA permit to install that meets the PSD requirements in the Ohio SIP Rules at OAC 3745-31-01 through 3745-31-20 constitutes a violation of the federally-approved Ohio SIP Rule at OAC 3745-31-13(A).

Title V Permit

83. By failing to maintain the pressure drop across No. 1 Shop Baghouse within the pressure drop range stated in the permit, Globe has violated Condition A.II.1 for Emission Units P023, P902, P903, and P904.

84. By failing to maintain the pressure drop across No. 1 Shop Sizing Line Baghouse within the pressure drop range stated in the permit, Globe has violated Condition A.II.1 for Emission Unit P017.

85. By failing to maintain the pressure drop across the Filter Baghouses for Emission Units F005 and P911 and the Loader Baghouse within the pressure drop range stated in the permit, Globe has violated Condition A.II.1 for Emission Units F005, P910, and P911.

86. By exceeding the visible particulate emission limit from control devices at Emission Units P023, P902, P903, P904, P907, and P908, Globe has violated Title V Condition A.I.1. for Emission Units P023, P902, P903, P904, P907, and P908.

87. By exceeding 20% opacity as a three-minute average emission limit at Emission Units P902, P903, and P904, Globe has violated Title V Condition A.I.1. for Emission Units P023, P902, P903, and P904.

88. By failing to consistently note in the visible emission operations log the color of emissions, whether the emissions were representative of normal operations, if the emissions were not representative of normal operations, the reason for the abnormal emissions, and the total duration of any visible emission incident, Globe has violated condition A.III.1 for Emission Units P023, P902, P903, P904, P907, and P908.

PTI 06-08118

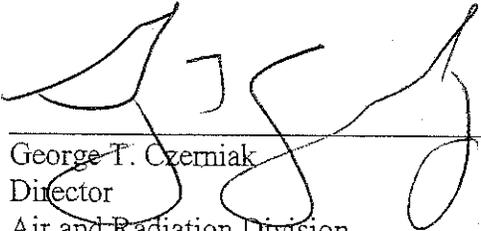
89. By exceeding the visible particulate emission limit for Emission Units F008, Globe has violated PTI 06-08118 Condition A.I.1.

PTI 06-08119

90. By exceeding the visible particulate emission limit for Emission Units F011, Globe has violated PTI 06-08119 Condition A.I.1.

Date

6/30/15


George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-15-OH-20, by Certified Mail, Return Receipt Requested, to:

Matthew Greene
Environmental, Health, and Safety Corporate Manager
Globe Metallurgical, Inc.
County Route 32
Waterford, Ohio, 45768

I also certify that I sent a copy of the Notice and Finding of Violation by first-class mail to:

Bob Hodanbosi
Chief, Division of Air Pollution Control
Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, Ohio 43266-1049

On the 30th day of June 2015.

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7644 3340

for Kathy Jones
Loretta Shaffer, Program Specialist
PAS, AECAB