From: Sieffert, Margaret
To: Williams, Jennifer
Subject: SAT Source information request email
Date: Thursday, August 15, 2013 8:08:00 AM

OAQPS has reviewed the SAT reports, however would like some additional language regarding the operational status of the sources of concern. The follow-up report language was provided by enforcement staff. The language provided gives an indication of what the production was during the monitoring period but does not provide information on whether the production was considered normal or abnormal. If you do not have this information readily available, we can try to obtain this information from IDEM or OEPA.

Thanks

East Liverpool Initial report:

- Were the sources operating as usual during the monitoring period?
  - Due to the downturn in the economy, the source was operating at about half capacity during the monitoring period.

East Liverpool Follow-up report:

- Were the sources operating as usual during the monitoring period?
  - The source of the key pollutant has an operating permit issued by OEPA that includes operating requirements.
  - Information about the source indicates that the facility had no significant change in production during the monitoring period.

Abraham Lincoln Initial report:

- Was the source operating as usual during the monitoring period?
  - The nearby source of key pollutants has an operating permit issued by IDEM that includes operating requirements.[1]
  - Information from the nearby source indicates that the most recent year of typical production level was 2007, and that the facility was operating at 56 percent of this level during the monitoring period.

Abraham Lincoln Follow-up report:

- Was the source operating as usual during the monitoring period?
  - The nearby source of the key pollutant has an operating permit issued by IDEM that includes operating requirements.[2]
  - Information about the nearby source indicates that the facility had no significant change in production during the monitoring period.

Marietta Initial report:

- Was the source of manganese operating as usual during the monitoring period?
  - Eramet is subject to the National Emissions Standards for Hazardous Air Pollutants

(NESHAP) Maximum Achievable Control Technology (MACT) for the Ferroalloys Production source category and was the only source covered when the MACT standard was developed. Since then several other sources have become subject to the MACT standard but all have more limited production. The facility has a CAA Title V operating permit issued by OEPA that includes operating requirements.[3]

- All three furnaces at the source were in operation at the time of this sampling project. Several other ancillary operations were idled during the sampling period, but those operations are not sources of manganese. During the sampling period the facility was operating at about 70% of what operations had averaged over the last 5 years.

Marietta Follow-up report:

- Was the source of manganese operating as usual during the monitoring period?
  - Eramet is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) for the Ferroalloys Production source category and was the only source covered when the MACT standard was developed. Since then several other sources have become subject to the MACT standard. Eramet has a CAA Title V operating permit issued by OEPA that includes operating requirements.[4]
  - Information about Eramet indicates that the facility had no significant change in production during the monitoring period.

Jefferson Initial report:

- Was the source operating as usual during the monitoring period?
  - The nearby source of arsenic, benzene, and benzo(a)pyrene has an operating permit issued by IDEM that includes operating requirements.[5]
  - Information from the nearby source indicates that this facility was operating at normal production levels.

Jefferson Follow-up report:

- Was the source operating as usual during the monitoring period?
  - The nearby source of the key pollutant has an operating permit issued by IDEM that includes operating requirements.[6]
  - Information about the nearby source indicates that the facility had no significant change in production during the monitoring period.

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[1] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at:

http://www.epa.gov/air/oaqps/permits.

[2] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: http://www.epa.gov/air/oaqps/permits.

[3] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: http://www.epa.gov/air/oaqps/permits/

[4] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: http://www.epa.gov/air/oaqps/permits/

[5] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: http://www.epa.gov/air/oaqps/permits.

[6] Operating permits, which are issued to air pollution sources under the Clean Air Act, are described at: http://www.epa.gov/air/oaqps/permits.