February 29, 2008



Mr. Mike Kelley
Ohio EPA
Office of Compliance Assistance and Pollution Prevention
P.O. Box 1049
Columbus, OH 43216-1049

RE: Ohio EPA's Tox-Minus Initiative
Eramet Marietta Inc. Projects and Reduction Goals

Dear Mr. Kelley:

Eramet Marietta Inc. (EMI) is honored to participate in Ohio EPA's Tox-Minus Initiative, and fully supports the Director's goals of reducing Ohio's TRI releases and lowering Ohio's placement on the national TRI ranking.

As follow-up to our ongoing commitment to reduce emissions and our initial commitment to participate in the Initiative, EMI has identified and further evaluated several projects that will result in measurable reductions in TRI releases upon implementation.

**Reduction Goals:**

1. Furnace #1 Upgrades

EMI is moving forward with plans for significant improvements to the largest of our three submerged electric arc furnaces. Furnace #1 is a significant producer of silicomanganese alloys worldwide, with the capability of producing ferromanganese alloys as well. Beginning in April 2008, and for a period of four to six weeks, Furnace #1 will undergo a major maintenance outage which will ensure its long-term viability in the ferroalloys marketplace. Completion of the project will not only result in improved furnace performance, but will also minimize the potential for malfunction events that may cause unpermitted emissions, and result in an overall decrease in actual particulate matter point source emissions as well.

As part of the relining process included in the outage, EMI plans to increase the depth of the furnace shell from 18.9 feet to 21.3 feet. This will increase the depth of the raw materials mix in the furnace reaction zone, allowing more contact time and contact surface area for the carbon monoxide gas generated at the electrode

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tips to react with the raw materials. This will result in both a reduction of carbon source requirements due to more efficient conversion of carbon monoxide to carbon dioxide, and better cooling and increased condensation of the furnace gases. As more gases will condense back into the raw material mix, particulate matter emissions from the Furnace #1 stack, including manganese, are expected to be reduced as much as 10% based on engineering calculations.

2. Furnace #1, Abatement Upgrade

The maintenance outage on Furnace #1 will include minor design modifications to facilitate the retrofitting of a new baghouse dust collector to replace the existing venturi wet scrubber. Although the design of the collector is currently in the initial engineering phase, and implementation of the final design will require review and approval of Ohio EPA, the replacement will result in the reduction of Furnace #1 particulate matter stack emissions of 50% or more.

3. Ammonia Emissions Reductions from Electrolytic Operations

EMI has completed an intermediate engineering study to identify and assess technologies for the reduction of total ammonia emissions from its specialty product operations. Ohio EPA is working with EMI to specify and approve a suitable technology through the NPDES Permit renewal effort. Although a selected technology is currently pending approval, EMI is continuing to evaluate additional abatement technologies and process modifications that may provide more effective reductions than those originally identified. Regardless of which technology is ultimately selected and approved, EMI is committed to significant overall reductions of ammonia emissions that could reach 20% from its specialty metals operations within a five-year period.

**Planned Action without Identified Reduction Goals as yet:**

Abated Truck Loading Station

EMI is currently evaluating the possible installation of an improved enclosure and/or dust collection system on our primary bulk truck loading station. This will reduce the fugitive airborne emissions associated with the periodic loading of bulk products into highway vehicles. As the fugitive emissions associated with bulk truck loading are of brief duration and are believed to have limited dispersion potential, the relative effects on TRI reduction may be minimal. Visible emissions reductions, improved facility housekeeping in the immediate area, and reduced employee exposure to dust may nonetheless prove to be positive outcomes from such an installation.

Again, EMI is proud to be a part of the Tox-Minus Initiative, and welcomes any input and support from Ohio EPA to facilitate our participation in the program. Jeff McKinney, EMI's Manager of Safety, Health and Environmental Affairs, remains our primary contact for the Initiative, and can be reached at (740) 374-1143. In addition, if there is ever anything I can do to assist in this process, please do not hesitate to contact me as well.

Sincerely,

Frank Bjorklund
Chief Executive Officer