





**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Seneca County
Tiffin Foundry & Machine, Inc.
423 Adams Street
Tiffin, OH 44883
Premise #0374020107
Inspection Follow-Up
Notice of Violation (NOV/non-HPV)

January 30, 2012

CERTIFIED MAIL

Mr. Steven Sobol, Chief Executive Officer
Tiffin Foundry & Machine, Inc.
P. O. Box 37
Tiffin, Ohio 44883

Dear Mr. Sobol:

This letter shall serve as follow-up to the second inspection and investigation conducted at the referenced facility on January 12, 2012. Attending this inspection were Ms. Alyse Johnson, Ms. Miranda Garlock and myself as representatives from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). The reason for this follow-up inspection was to see the cupola furnace operating and to determine the compliance status of this emissions unit with the rules and regulations of DAPC.

Based on our observations during the inspection, the findings are summarized as follows:

1. Tiffin Foundry & Machine, Inc. operates a cupola that has a process weight rate of eight thousand (8,000) pounds per hour. During this site visit, we witnessed this emissions unit in operation. The first two hours are limited to charging the unit and is not controlled. Emissions were excessive during this period and are considered in violation of both Ohio Administrative Code (OAC) rules 3745-17-07(A), 3745-17-11, and ORC 3704.05. The charging of the furnace should be controlled by the wet scrubber. Please explain why this operation is left uncontrolled. It is necessary that Tiffin Foundry & Machine, Inc. submit a permit application for this emissions unit along with an explanation of how OAC rules 3745-17-07(A) and 3745-17-11 will be complied with. An electronic copy of the application with the associated Emissions Activity Category (EAC) form can be obtained from Ohio EPA's website at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.

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2. This foundry is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 63, Subpart ZZZZZ designated for Iron and Steel Foundries. U.S. EPA administers this rule. It is highly advisable that Tiffin Foundry & Machine, Inc. review this rule in detail and come into compliance with all of its applicable requirements.
3. Emission calculations are necessary for two core mixers, the air arc welder, and the pickling line tanks (as previously identified in the letter dated in lieu of permit application submittal. The calculations should represent the potential to emit for each respective emissions unit.

Ohio EPA requests that Tiffin Foundry and Machine submit a response to this letter, including a compliance plan for the cupola and emissions calculations for the other emissions units, within 30 days of receiving the letter. The compliance plan should include a timeline for addressing the emissions during charging of the unit and the submittal of a permit application. Please be advised that a response to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns regarding this letter, please feel free to call me at (419) 373-3118 or e-mail at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/lir

pc: DAPC-NWDO File
Certified Mail Receipt Number 7009 1410 0001 1834 1484

cc: Alyse Johnson, DAPC-NWDO
Jay Salamone, jay@tiffinfoundry.com
Jennifer Jolliff, DAPC-NWDO
Mike Salamone, mike@tiffinfoundry.com
Miranda Garlock, DAPC-NWDO
Patrick Miller, Miller.Patrick@epamail.epa.gov
Steven Sobol, steven@tiffinfoundry.com
Tom Kalman, DAPC-CO
William MacDowell, MacDowell.William@epamail.epa.gov