



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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September 21, 2011

Certified Mail

Mr. Larry Pickering
Piqua Champion Foundry, Inc.
918 S. Main Street
Piqua, OH 45356

Re: Monitoring, record keeping and reporting violations for air emissions units P001, P002 and P902, Ohio EPA facility ID 0855100015

Dear Mr. Pickering:

WARNING LETTER

This letter is in regards to monitoring, recordkeeping and reporting violations that were identified during a full compliance evaluation (FCE) conducted by the Regional Air Pollution Control Agency (RAPCA) on May 3, 2011 at Piqua Champion Foundry, Inc. (PCF). The violations were documented for Ohio EPA air emissions units P001, P002 and P902 and are discussed below. RAPCA realizes the following items are very detailed and technical in nature so we extend our willingness to meet with you to assist in the resolution process.

P001 and P002 (Core and mold making operations):

- 1) Pursuant to C.1.d)(1) of Permit-to-Install and Operate (PTIO) number P0106152, effective June 1, 2010, PCF is required to maintain annual records of the quantity of sand used, including reclaimed sand, in tons for P001 and P002. During the FCE, it was noted that only purchase records are kept for sand. PCF did not have records for new or reclaimed sand used. Failure to maintain annual records of sand usage is a violation of the PTIO.
- 2) Pursuant to C.1.d)(2) of PTIO number P0106152, PCF is required to perform daily checks, when the emissions units are in operation and when weather conditions allow, for any visible particulate from the egress points serving P001 and P002. Documentation of the presence or absence of any visible emissions (VEs) is required in an operations log. Additional information must be documented in the log for any VEs observed. PCF did not conduct the required VE checks and did not have the required operations log in violation of the monitoring and record keeping requirements in the PTIO.
- 3) Pursuant to C.1.d)(4) of PTIO number P0106152, PCF is required to calculate the total combined volatile organic compound (VOC) emission rate for all binder materials, mold washes and mold releases in tons per month. It was noted that the monthly VOC emission rate had not

been calculated by PCF. Failure to determine the total combined monthly VOC emission rate for all binder materials, mold washes and mold releases is a violation of the PTIO.

4) Pursuant to C.1.f)(1)b. of PTIO number P0106152, compliance with the combined annual VOC emission limitation for P001 and P002 shall be determined. This includes summation of the total Mold Binder VOC emissions, Mold Wash VOC emissions and Mold Release VOC emissions in tons per year as required by C.1.f)(1)b.iii. of the PTIO. Pursuant to C.1.f)(1)b.i. of the PTIO, Mold Binder emissions are based upon an emission factor (lbs VOC per ton sand) and the combined annual sand usage in tons. Due to PCF's failure to maintain the quantity of sand used (see paragraph #1 above), the Mold Binder emissions were unable to be determined. Pursuant to C.1.f)(1)b.ii. of the PTIO, Mold Wash emissions and Mold Release emissions are based upon the record keeping requirements in C.1.d)(4) of the PTIO. Due to the lack of monthly VOC emissions calculations (see paragraph #3 above), the yearly Mold Wash emissions and Mold Release emissions were not calculated. PCF failed to demonstrate compliance with the combined annual VOC emission limitation due to the lack of combined annual VOC emissions calculations for P001 and P002. Failure to determine the combined annual VOC emissions from P001 and P002 is a violation of the PTIO.

5) Pursuant to C.1.f)(1)d. of PTIO number P0106152, compliance with the annual particulate emission (PE) limitation for P001 and P002 shall be based upon the record keeping requirements for sand usage in C.1.d)(1) of the PTIO. Failure to track sand usage, as noted in paragraph #1 above, prevents PCF from verifying compliance with the annual PE limitation in violation of the PTIO.

6) Pursuant to C.1.e) of PTIO number P0106152, PCF is required to submit an annual Permit Evaluation Report (PER) for P001 and P002. The PER shall identify any days when VEs were observed from the egress points serving P001 and P002, along with corrective actions, and if there was an exceedance of the annual combined VOC emission limitation. The PER shall also identify any deviations of the operational restrictions, emission limitations, monitoring, record keeping or reporting requirements in the PTIO. A PER was received from PCF on February 11, 2011 which identified no exceedances or deviations from the PTIO limitations. The PER did not identify the facility's failure to properly record sand usage, to perform and record daily VE checks, to determine monthly and annual VOC emissions or to determine annual PE in violation of the PTIO.

P902 (Sand Reclamation System, controlled by 2, 'big & small', baghouses):

1) Pursuant to C.1.d)(2) of PTIO number P0106178, effective June 1, 2010, PCF is required to install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across *each* baghouse serving P902 when the emissions unit is in operation. PCF is required to record the pressure drop across each baghouse on a daily basis. Whenever the monitored value for the pressure drop deviates from the acceptable range, the permittee shall promptly investigate the cause of the deviation and shall maintain records of each investigation and the corrective actions taken.

During RAPCA's FCE, PCF indicated that a pressure drop monitor had been installed on one of the baghouses but was unable to locate it. No records were being kept of the required daily pressure drop readings or any deviations, investigations and corrective actions. Failure to properly install pressure drop monitoring equipment and failure to monitor and record the pressure drop from the big and small baghouses is a violation of the PTIO.

2) Pursuant to C.1.d)(1) of PTIO number P0106178, the acceptable pressure drop range across each baghouse serving P902 is five to seven inches of water. This range was established as an indicator of compliance for the emission limitation(s) contained in the PTIO. Failure to properly monitor and record the pressure drop from the big and small baghouses results in a failure to demonstrate compliance with the acceptable pressure drop range in violation of the PTIO.

3) Pursuant to C.1.d)(3) of PTIO number P0106178, PCF is required to maintain monthly records of the quantity of sand used, including reclaimed sand, in tons for P902. As noted in paragraph #1 for P001 and P002, only purchase records are kept for sand. PCF did not have records for new or reclaimed sand used. Failure to maintain monthly records of sand usage is a violation of the PTIO.

4) Pursuant to C.1.d)(4) of PTIO number P0106178, PCF is required to perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points serving P902. Documentation of the presence or absence of any VEs is required in an operations log. Additional information must be documented in the log for any VEs observed. PCF did not conduct the required VE checks and did not have the required operations log in violation of the monitoring and record keeping requirements in the PTIO.

5) Pursuant to C.1.f)(1)b. of PTIO number P0106178, compliance with the annual PE limitation for P902 shall be based upon the record keeping requirements for sand usage in C.1.d)(3) of the PTIO. Failure to track sand usage, as noted in paragraph #3 above, prevents PCF from determining the annual PE for P902 and verifying compliance with the annual PE limitation in violation of the PTIO.

6) Pursuant to C.1.f)(1)d. of PTIO number P0106178, compliance with the annual particulate matter of 10 microns or less (PM10) emission limitation for P902 shall be based upon the record keeping requirements for sand usage in C.1.d)(3) of the PTIO. Failure to track sand usage, as noted in paragraph #3 above, prevents PCF from determining the annual PM10 emissions for P902 and verifying compliance with the annual PM10 emission limitation in violation of the PTIO.

7) Pursuant to C.1.e) of PTIO number P0106178, PCF is required to submit an annual Permit Evaluation Report (PER) for P902. The PER shall identify any deviations of the acceptable pressure drop range for the baghouses, including the lack of investigations, correction actions or associated record keeping for any deviations and any periods of operation when process emissions were not vented to the baghouse. The PER shall identify any days when VEs were

observed from the stacks and/or egress points serving P902, along with corrective actions. The PER shall also identify any deviations of the operational restrictions, emission limitations, monitoring, record keeping or reporting requirements in the PTIO. A PER was received from PCF on February 11, 2011 which identified no exceedances or deviations from the PTIO limitations. The PER did not identify the facility's failure to properly install pressure drop monitoring equipment, to monitor and record pressure drop, to determine compliance with the acceptable pressure drop range, to properly record sand usage, to perform and record daily VE checks or to determine annual PE and PM10 emissions in violation of the PTIO.

During the FCE, RAPCA also noted deterioration at the bottom of the big baghouse serving P902. This resulted in the escape of foundry sand from the base of the baghouse which collected in a pile next to the unit. RAPCA requires PCF to properly maintain the big baghouse by making any and all necessary repairs to eliminate the escape of foundry sand.

This letter serves as official notification of the aforementioned monitoring, record keeping and reporting violations for P001, P002 and P902 at PCF. Each of the deficiencies cited above shall be corrected and addressed by PCF in a written response to RAPCA. PCF's response shall be submitted within 30 calendar days of receipt of this letter and shall include the methods used to correct the deficiencies. Within 30 calendar days of receipt of this letter, PCF shall also submit a revised PER containing the above-referenced items which were omitted from the original PER received on February 11, 2011. Enclosed are a blank PER form and instructions for assisting you with resubmittal.

In regards to establishment of a record keeping program for PCF, please note that you may contact Jim Pellegrino of the Office of Compliance Assistance and Pollution Prevention (OCAPP) for assistance. Mr. Pellegrino can be reached at (937) 285-6439. RAPCA is also willing to work with you to set up a record keeping program which will comply with the requirements referenced in this letter.

RAPCA also reminds PCF that your facility is required to comply with 40 CFR Part 63 Subpart ZZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources. Pursuant to this federal regulation, PCF is required to submit semiannual compliance reports to the Administrator which identify any deviation from the pollution prevention management practices in 40 CFR Parts 63.10885 or 63.10886 and the corrective action taken. The semiannual reports shall be sent to: U.S. EPA Region V, Director, Air and Radiation Division, 77 West Jackson Blvd., Chicago, IL 60604-3507. RAPCA did not receive any records from PCF to indicate that the required reports have been submitted to the U.S. EPA. RAPCA reminds PCF of its obligation to submit the appropriate semiannual reports to U.S. EPA per the above NESHAP requirement.

We appreciate your prompt attention to this matter. If you have any questions regarding the information contained in this letter, please contact me at (937) 496-7541, swetzca@rapca.org, or Jennifer Riley at (937) 225-4438, rileyjm@rapca.org.

RAPCA is available to meet and discuss the above issues and/or assist your facility with any concerns.

Sincerely,



Christine A. Swetz
Air Pollution Control Specialist
Abatement Unit

Enclosure

cc: William MacDowell, U.S. EPA
Tom Kalman, Ohio EPA
Jenny Marsee, RAPCA
Jeff Canan, RAPCA
Jennifer Riley, RAPCA (via e-mail)
Dale Davidson, RAPCA (via e-mail)
Eileen Moran, RAPCA (via e-mail)

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Larry Pickering
 Piqua Champion Foundry, Inc.
 918 S. Main Street
 Piqua, OH 45356

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PS Form 3811, February 2004

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