



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Auglaize County
St. Marys Foundry Inc.
St. Marys
03 06 01 0004
Notice of Violation - HPF

CERTIFIED MAIL
7006 0100 0003 7708 5633

April 8, 2008

Mr. Greg Eaglowski
St. Marys Foundry Inc.
405 E. South Street
St. Marys, Ohio 45885

Dear Mr. Eaglowski:

This letter shall serve as follow-up to the facility inspection conducted on March 12, 2008, of the above referenced facility. The purpose of this inspection was to determine the compliance status of all air contaminant sources located there.

Based on our discussions, my observations during the inspection, and a review of the company's files, my findings are as follows:

1. The ball mill crusher (emissions unit P012) room / area of the plant had heavy fugitive particulate emissions within the room. It could be felt impacting skin, and caused a haze through which it was difficult to view the capture set-up above the unit. The outside of the building was examined, including on the roof. Where some baghouse ducting goes through roof at a spot above the ball mill crusher, a large broad mound of accumulated particulate was evident, which is an indication the particulate is being emitted to the ambient air.

This emissions unit is permitted as a 'point source' based on the company's application and Fee Emissions Reports. As such, no fugitive emissions are permitted. The agency concludes from all this that the capture system for this emissions unit was / is malfunctioning. The company's Compliance Assurance Monitoring (CAM) records up to the day of the inspection contain no indication of such malfunction for this unit. These circumstances constitute violations of OAC rules 3047-15-06(B) and 3745-17-11, and Condition A.III.5.b for this unit in the company's Title V operating permit, in violation of ORC 3704.05.

2. In a recent public appearance by Division of Air Pollution Control staff at the community's public high school, students expressed concerns regarding fugitive dust emissions at the plant. Comments from the students indicated fugitive dust emissions are adversely affecting the area around the facility. They cited specific incidents of significant fugitive dust emissions from sand handling operations and holes in 'super sacks'. The agency considers these comments to be analogous with receiving a complaint against the facility.

3. It was discussed that the company routinely performs the visible emissions checks from building egress points during darkness. Although it is likely that the main furnace operations, performed on the night shift for favorable electric rates, contributes significantly to the overall plant fugitive particulate emissions, the only requirements in the facility's Title V operating permit for visible emissions checks is for fugitive particulate from the sand / binder in-line mixers (emissions units F001, F002, and F003), and it is our understanding these units operate during the daytime. Therefore, these visible emissions checks should henceforth be performed during the daytime.
4. Electric induction melting furnaces 'A' and 'B' (emissions units F015 and F016) have been shutdown. Please revise the company's STARShip application accordingly.
5. It was discussed how the existing miscellaneous grinding / cleaning operations in the shot blasting area (now with new partial enclosures and induced-draft filters) have not yet been assigned status as emissions unit(s). Please revise the company's STARShip application to include these emissions units as insignificant emissions unit(s). Please also add the two new natural gas fired air make-up units to STARShip.

The company is required to correct the particulate capture violation discussed in Item 1, and to address the public nuisance fugitive dust complaint(s) in Item 2. Please submit a detailed written response summarizing the steps the company will take to correct the control system malfunction and reduce fugitive dust emissions. This response needs to be very specific on what will be done, the time frame for completing the repairs and returning to compliance, including the cost incurred to do so.

The response should be submitted by May 9, 2008. All other air contaminant sources at this location appear to be in compliance with applicable air emissions limitations at this time.

Please be advised that the submission of information to respond to this letter does not constitute waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC 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.

Should the company have any questions and/or comments, I may be reached at (419) 373-3117. I may also be contacted electronically by E-mail at: paul.chad@epa.state.oh.us

Sincerely,



Paul Chad
Division of Air Pollution Control
/csl

pc: Sam Araj, DAPC, NWDO
Don Waltermeyer, DAPC, NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, US EPA - Region V
(DAPC; NWDO File)
Follow-up File

0306010004 ST. Mary's Foundry 4/8/08

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 ST MARYS OH 45885

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1. Article Addressed to:

MR GREG EAGLOWSKI
 ST MARYS FOUNDRY INC
 405 E SOUTH ST
 ST MARYS OH 45885

DAPC/Paul C./csl

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