



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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

October 8, 2008

**CERTIFIED MAIL**

Mr. Herb Kleine, Owner  
Ryder-Heil Bronze Inc.  
126 E. Irving Street  
Bucyrus, Ohio 44820

Re: Notice of Violation (NOV- nonHPF): Complaint investigation and facility inspection conducted on September 26, 2008, at Ryder-Heil Bronze Inc. (0317010008) with response due by November 3, 2008.

Dear Mr. Kleine:

This letter shall serve as follow-up to the complaint investigation and subsequent facility inspection conducted on September 26, 2008. An inquiry was received from a concerned family on September 19, 2008 by the Ohio Environmental Protection Agency's Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) questioning the nature of the emissions from the facility's operation because their child has an elevated blood lead level. The family has lived in their current house across the street from the facility for approximately three months and in the same neighborhood prior to the pregnancy.

Findings of this inspection and related information can be summarized as follows:

1. Ryder-Heil Bronze Inc. is a bronze casting foundry. The facility employs green sand molding to create molds for the parts, specifically bushings, to be cast. The company melts pre-mixed bronze ingots containing different percentages of copper, tin and lead, in one of two coreless electric induction furnaces where it is then tapped and poured into the molds. Once the parts have been cast and cooled, they are sent to the grinding room and to the sand blasting machine to remove the excess risers, gates and mold sand. Parts that have been sand blasted are then machined down to the final casted product.
2. According to Ohio EPA's files, Ryder-Heil Bronze Inc. was issued registration status permits back in 1976 and 1977 for the following emissions units:
  - a. B001- Boiler no.1 (oil-fired space heat boiler);
  - b. P001- Furnace no.1 (450 lb Campbell-Hausfeld Co. crucible tilt furnace);
  - c. P002- Furnace no. 2 (250 lb crucible tilt furnace);
  - d. P003- Furnaces no. 3, 4, 5 (300 lb crucible pit furnace);
  - e. P004- Furnace no. 6 (250 lb crucible furnace- tilting type);

- f. P005- Baking Cores (Porbeck Mfg. Co. natural gas core oven);
- g. P006- Sand Blast Machine (Pangborn sand blasting with baghouse); and
- h. P007- Grinding Room (Gate cut off and snag grinders).

Based on the information provided during our walk-through of the facility's operation, emissions units P001-P003 were removed in the late 1970's while P005 was removed approximately five years ago. Additionally, while emissions units have been removed from the facility, other emissions units have been installed without receiving permits-to-install and permits-to-operate. Emission unit P006 was removed and replaced with a Goff sand blast machine and the 500 lb and 1200 lb melt furnaces have also not been permitted. Ryder-Heil Bronze Inc. is in violation of OAC rule 3745-31-02(A)(1)(b), 3745-35-02 and ORC 3704.05 for failing to obtain permits-to-install and operate (PTIO) prior to the installation of new emissions units.

3. The facility utilizes individual vents above each of the induction furnaces and a portable vent system when pouring takes place. Emissions from these operations are not controlled prior to being emitted into the atmosphere. As part of the permit applications, the company needs to determine emissions of all criteria pollutants and air toxics from each emissions unit. This information must represent a "worst case" emissions scenario for each unit. Please note that further violations may exist if we determine that the company did not employ "best available technology" in controlling emissions.
4. During the site visit, we reviewed the facility's potential applicability to US EPA's Maximum Achievable Control Technology (MACT) standard for secondary nonferrous metals processing. This standard, subpart TTTTTT, for area sources, would have been applicable to the facility if Ryder-Heil Bronze Inc. was melting post-consumer nonferrous metal scrap to make ingots, bars, blocks, or metal powders. Based on my observations and our discussions, the facility is not involved in this type of operation and is therefore not applicable to MACT subpart TTTTTT.

However, Ryder-Heil Bronze Inc. needs to be aware that within the next year US EPA will be promulgating MACT area source standards for nonferrous foundries. The facility will need to monitor this rule development so that when the rule is issued final, a determination can be made as to whether the rule is applicable and if so, all notification and compliance deadlines are met.

Ohio EPA requests Ryder-Heil Bronze Inc. to provide a response to this notice of violation, including a complete facility potential-to-emit analysis and compliance plan for addressing the permitting deficiencies, by no later than **November 3, 2008**. Please note that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for this violation. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

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I would like to thank you for your assistance and cooperation during this complaint investigation. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-4112 or electronically at jennifer.jolliff@epa.state.oh.us.

Sincerely,



Jennifer L. Jolliff  
 Division of Air Pollution Control

JLJ/ljr

pc: Don Waltermeyer, DAPC-NWDO  
 Tom Kalman, DAPC-CO  
 John Paulian, DAPC-CO  
 Lisa Holscher, US, EPA  
 DAPC-NWDO Correspondence File

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Article Description: Herb Kleine - Ryder Neil Buzze Inc. 126 E. IRVING STREET CLEVELAND OH 44120		
PS Form 3800, August 2006 See Reverse for Instructions		

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<p>1. Article Addressed to:</p> <p>HERB KLEINE, OWNER          RYDER NEIL BUZZE INC.          126 E. IRVING STREET          CLEVELAND, OH 44120</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

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