



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

March 12, 2010

Mr. Herb Kleine, President  
Ryder-Heil Bronze Inc.  
P. O. Box 647  
Bucyrus, Ohio 44820-0647

Re: Resolution to Notice of Violation issued to Ryder-Heil Bronze Inc. (0317010008)  
on October 8, 2008, based on inspection conducted on September 26, 2008

Dear Mr. Kleine:

This letter shall serve to resolve the Notice of Violation (NOV) issued to the above referenced facility on October 8, 2008. The violations cited in the letter were based on an unannounced inspection conducted on September 26, 2008, to investigate a lead complaint. It was determined that the facility installed two melt furnaces prior to obtaining Permits-To-Install and Operate (PTIOs).

The NOV requested a Potential-To-Emit (PTE) analysis and compliance plan to address the permitting deficiencies by November 8, 2008. An extension was requested by the facility so that Occupational Safety and Health Administration (OSHA) worker testing for metals and particulates could be completed and reviewed while an outside consultant was hired to assist with the permitting issues. According to our correspondence, the OSHA results were received on March 12, 2009, and demonstrated no worker exposure issues. As for the permitting, the company was having a difficult time obtaining permitting guidance from one consultant so a new consultant was retained. A PTE analysis was finally received by this office on July 15, 2009. Once the information was reviewed and accepted, a PTIO application for the two melt furnaces was submitted via Air Services on October 29, 2009, and it is currently under review.

The submittal of the PTE analysis and the PTIO application resolves the violations cited in the NOV. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. 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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Should you have any questions or comments regarding this letter, please feel free to contact me at (419)373-4112 or by e-mail at [jennifer.jolliff@epa.state.oh.us](mailto:jennifer.jolliff@epa.state.oh.us).

Sincerely,



Jennifer L. Jolliff  
Division of Air Pollution Control

JLJ/lir

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