



Environmental
Protection Agency

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

Re: Hardin County
Kenton Iron Products, LLC.
Premise # 0333010042
Notice of Violation (NOV) – non HPV

August 25, 2011

CERTIFIED MAIL

Ms. Jessica Ulmer, Safety Coordinator
Kenton Iron Products, LLC
347 Vine Street
Kenton, Ohio 43326

Dear Ms. Ulmer:

This letter shall serve as follow-up to the inspection conducted on July 21, 2011, of Kenton Iron Products, LLC. facility located at 13917 Vision Drive in Kenton, Ohio, by this writer, Mr. Chad Winebrenner, Ms. Brianna Hinton and Mr. Ryan Schwartzengraber. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. Emissions Unit P005 (Pangborn Shotblast unit with baghouse) was removed on December 27, 2010. This unit has been permanently shut down.
2. On January 3, 2011, P005 was replaced by a Wheelabrator with a larger capacity without first obtaining a Permit to Install and Operate (PTIO).

Failure to obtain a PTIO prior to installation of a new source is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A) and ORC 3704.05. To remedy this situation the company must submit complete PTIO applications to this office for the unit in question no later than September 26, 2011.

3. Emissions unit F004 (Mold Making Operations; AKA: Mixer VMX1) was removed on June 27, 2011.
4. On July 5, 2011, F004 was replaced by a similar unit with a larger capacity without first obtaining a PTIO.

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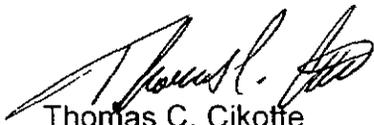
Failure to obtain a PTIO prior to installation of a new source is a violation of OAC rule 3745-31-02(A) and ORC 3704.05. To remedy this situation the company must submit complete PTIO applications to this office for the unit in question no later than September 26, 2011.

The company's written response to this letter is requested by September 26, 2011. It should be submitted to Ohio EPA, Northwest District Office and contain the requested PTIO applications as well as a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future.

Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3137, or via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/lr

pc: ~~Thomas C. Cikotte, DAPC - NWDO~~
Certified Mail Receipt Number 7009 1410 0001 1834 0968

ec: William MacDowell, U.S. EPA Region V
Tom Kalman, DAPC - CO
Jennifer Jolliff, DAPC - NWDO
Thomas C. Cikotte, DAPC - NWDO