



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

Re: Hardin County  
Kenton Iron Products – Vine Street  
Premise # 03.33.01.0157  
**Notice of Violation (NOV)**

April 16, 2009

**CERTIFIED MAIL**

Mr. Jeff Mount, Environmental Manager  
Kenton Iron Products  
550 Liberty Drive  
Delaware, Ohio 43015

Dear Mr. Mount:

This letter shall serve as follow-up to the site visit of Kenton Iron Products', Inc. (KIP) facility at 347 Vine Street, in Kenton, Ohio, by Mr. Chad Winebrenner, Ms. E. Jay Murphy and I on January 22, 2009. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. The following is a list of emissions units at the Vine St. facility that will require permitting: Electric induction furnace – GSFU 1; Electric induction furnace – GSFU 2; Electric induction furnace – GSFU 3; Electric induction furnace – GSFU 4; Magnesium treatment (Inoculation); Pouring floor; Cooling floor with casting breakout area; Sand vibramill; Pangborn shotblast unit; Sand handling/reclamation system including sand muller; Mold making operations; Core mixer - GMX 1; Isocure core making machine; mold/core wash coating operations; mold/core release coating operations; shakeout sand storage silo bin vent; new sand storage silo bin vent.

Each of the units listed above was installed and/or modified prior to the company obtaining a Permit to Install/Operate (PTIO). Each instance of installing and operating air contaminant sources without first obtaining the appropriate permits to install (PTI) and permits to operate (PTO) is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A). Each violation of OAC rule 3745-31-02(A) also constitutes a violation of Ohio Revised Code (ORC) 3704.05.

2. The facility also employs three (3) ladle preheaters. Based on the information provided to Ohio EPA during the course of our inspection, each of these units are exempt, per OAC 3745-31-03(A)(1)(a). No further action is required for the ladle preheaters.

Mr. Jeff Mount, Environmental Manager  
April 16, 2009  
Page 2

3. Regarding the shell core machines, based on the information provided to Ohio EPA during the course of our inspection, emissions from each of these units are de minimis making the units exempt from permitting requirements pursuant to OAC rule 3745-15-05. This determination is based on VOC information as provided under the current sand/binder systems employed. If modifications are made to the systems or a different core sand/binder is employed, this determination may change and would require reevaluation.

The company's written response to this letter is requested by May 25, 2009. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future. The response should also include complete PTIO applications, including all applicable emissions activity category (EAC) forms, emissions calculations and process flow diagrams.

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 electronically via e-mail at [thomas.cikotte@epa.state.oh.us](mailto:thomas.cikotte@epa.state.oh.us).

Sincerely,



Thomas C. Cikotte  
Division of Air Pollution Control

/l/r

pc: Lisa Holscher, U.S. EPA Region V  
Tom Kalman, DAPC - CO  
Don Waltermeyer, DAPC - NWDO  
Thomas C. Cikotte, DAPC - NWDO  
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Certified # 7006 0100 0003 7708 7354