



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road  
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 Korleski, Director

Re: Henry County  
Cast Metals, Inc.  
104 W. North Street  
Deshler, OH 43516  
Premise #0335000015  
Notice of Violation

August 25, 2009

CERTIFIED MAIL

Mr. Scott E. Ferguson  
General Manager/Vice President  
Cast Metals, Inc.  
104 W. North Street  
P.O. Box 87  
Deshler, Ohio 43516

Dear Mr. Ferguson:

This letter shall serve as a follow-up to the site inspection conducted on July 15, 2009, at the above referenced facility. The purpose of the inspection was to determine the facility's compliance status with the rules and regulations of the Division of Air Pollution Control (DAPC). Accompanying me on this inspection was Mr. Brian Riedmaier also from the Northwest District Office (NWDO).

Based on the facility tour, our observations during the inspection and a review of the company files, the findings of this inspection can be summarized as follows:

1. Cast Metals, Inc. (CMI) operates two electric induction furnaces. The process weight rate of the furnace is 1,200 pounds per batch. A batch lasts 45 minutes long. The batch usually consists of 825 pounds of cast iron, 375 pounds of steel and 2-3 pounds each of silica and carbon. Only one induction furnace is operated at one time.

These emission units (EUs) were identified in prior correspondence and the company was cited for not being in compliance with DAPC regulations. This was detailed in a June 22, 1995 letter. It was further referenced in an October 3, 1997 post-inspection letter. The company's failure to obtain permits has not been resolved.

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CMI is required to submit a Permit to Install and Operate (PTIO) application along with the corresponding Emissions Activity category (EAC) forms for these two furnaces. This information can be downloaded and obtained from Ohio EPA's webpage at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>.

2. CMI operates a shotblast machine. This EU has not been permitted and, here again, the company is in violation of Ohio Administrative Code (OAC) rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05. A PTIO application and an EAC form are required for this EU.
3. CMI operated, at one time, two cupolas. These EUs have been shut down. Therefore, it is necessary to indicate the date when the cupolas were no longer operated. In addition, since these EUs have not been dismantled, operation of these units is strictly prohibited until and unless CMI is issued a PTIO for these units.
4. In addition, CMI also operates the following emission units it has been installed and operated in violation of OAC rule 3745-31-02 and ORC 3704.05:
  - a. Ductile iron inoculation;
  - b. Pouring molten metal;
  - c. Casting shakeout;
  - d. Cooling and cleaning castings;
  - e. Finish castings;
  - f. Core and molding sand unloading and storage; and
  - g. Mold sand preparation and mold making.
5. CMI is dumping on the facility grounds processed sand that is contaminated with organics. This matter will be referred to Ohio EPA's Division of Solid and Infectious Waste (DSIWM) and Division of Surface Water (DSW) for further investigation.

CMI is required to submit the cupola's shutdown date(s) and the required applications by no later than September 25, 2009. Please also be advised 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.

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If you have any questions and/or comments about this letter, you are welcome to call me at (419) 373-3118 or e-mail me at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control

/llr

pc: Don Waltermeyer, DAPC/NWDO  
Lisa Holscher, US EPA Region 5  
Tom Kalman, DAPC/CO  
DAPC-NWDO Henry County File  
Certified Receipt Number 7009 1680 0002 4297 0830

ec: Brian Riedmaier, DAPC/NWDO  
Dana Martin-Hayden, DSW/NWDO  
John Pasquarette, DSIWM/NWDO  
Samir Araj, DAPC/NWDO