



State of Ohio Environmental Protection Agency

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June 1, 2007

Thomas Whitten
Columbus Steel Castings
2211 Parsons Avenue
Columbus, Ohio 43207

RE: **Notice of Violation** based upon the ongoing compliance evaluation for
Columbus Steel Castings, Premise No. 0125040020

Dear Mr. Whitten:

The Ohio Environmental Protection Agency (Ohio EPA), Division of Air Pollution Control (DAPC), Central District Office (CDO), is currently conducting the full compliance evaluation of Columbus Steel Castings, located at 2211 Parsons Avenue, Columbus, Ohio. Ohio EPA, DAPC/CDO representatives including Olen Ackman, Bryon Marusek, John McGreevy, Adam Novak and Adam Ward participated in the compliance evaluation. The purpose of the compliance evaluation is to document Columbus Steel Castings' (CSC) compliance status with the effective Title V permit, specific Permits-to-Install (PTI), Consent Order, applicable Preventive Maintenance and Malfunction Abatement Plan (PMMAP), applicable state and federal rules and regulations.

The compliance evaluation for CSC was initiated in June of 2006 and has consisted of numerous site visits. During this time, Ohio EPA conducted complaint investigations resulting in a Notice of Violation letter sent October 17, 2006. To date, Ohio EPA has not received a satisfactory response to the violations cited and information requested therein.

On December 19, 2006, Ohio EPA sent a Notice of Violation letter based upon compliance evaluation findings to date. The letter cited multiple violations, specified eleven necessary "Actions" and requested dates for submittal of each action item. On March 5, 2007, Ohio EPA received a response from Calfee, Halter & Griswold LLP, representing CSC.

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

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On February 22, 2007, Ohio EPA sent another Notice of Violation resulting from improperly reporting malfunctions. On March 8, 2007, Ohio EPA received a response from Calfee, Halter & Griswold LLP.

A full compliance evaluation consists of a complete evaluation of all Title V non-insignificant emissions units and many insignificant emissions units. Listed below are "Findings" based upon the site visits, Method 9 readings, Method 22 readings, a review of specific record keeping maintained onsite, specific process information, reports submitted to Ohio EPA and historical documents for this facility. The "Finding(s)" are followed by "Violation(s)" (if applicable) and "Action(s)" necessary to address any stated violations. The letter concludes with a Compliance Plan and Schedule requesting dates for when each respective "Action(s)" will be taken. For clarification, the Title V emission units have been grouped according to their respective department.

1. Findings: P901: 25 ton/hr electric arc furnace #1 vented to baghouse B-3216
P902: 18 ton/hr electric arc furnace #2 vented to baghouse B-3216

On March 7, 2007, March 27, 2007, March 30, 2007, and April 2, 2007, the 25 tons/hr electric arc furnace #1 (P901) was observed in operation by Ohio EPA staff. Visible emissions readings were conducted in accordance with Method 22 on March 27, 2007, documenting fugitive emissions. In addition, Method 9 readings were taken on baghouse B-3216 documenting visible emissions in excess of 44% opacity as a 6 minute average.

As specified in the December 19, 2006, Notice of Violation letter and witnessed during each above referenced site visit, the overhead canopy/hooding capture system does not appear to capture fugitive particulate emissions in accordance with the effective Title V permit. CSC explained that the system was fixed on March 27, 2007. On March 30, 2007, Ohio EPA staff observed a small increase in capture efficiency during the melt cycle and oxygen lancing, however, no changes in capture efficiency was witnessed during other furnace cycles. In addition, Ohio EPA staff witnessed excessive fugitive emissions on the roof and ductwork over the furnace system on March 27, 2007. To date, Ohio EPA has not seen any improvement in the capture efficiency of the overhead canopy/hooding and believes that the furnace draw does not alternate to the tapping hood properly, resulting in excessive fugitive emissions both inside and outside the building.

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On March 30, 2007, Ohio EPA staff examined baghouse B-3216 which controls P901 and P902. On March 30, 2007, CSC staff explained that the automated system for monitoring the compartment pressure drop had malfunctioned and manometers had been installed as a replacement. During this site visit, 4 of the 16 manometers had pressure drops below 1-inch of water. CSC staff explained that water was in the lines. After blowing water out of the lines, compartment 5 still had a pressure drop of 0 inches of water. The Title V permit specifies an operating range of 2-10 inches of water for each baghouse compartment. Fugitive emissions were documented on April 2, 2007, in excess of 44% opacity from B-3216 in the vicinity of compartment 5.

On May 3, 2007, CSC staff explained that a thorough investigation of the damper controls for P901 and P902 had been completed. The investigation revealed that the dampers were improperly set and thus did not open/close properly during various stages of the melt cycle. In addition, CSC staff explained that the dampers have never worked properly. These dampers are used to maximize capture and control of emissions from each stage of the melt cycle for P901 and P902. Therefore, when they are not operating properly, the capture/control efficiency is compromised and emissions limitations specified in the applicable Title V permit have likely been violated.

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

In addition, allowing visible particulate emissions in excess of 20% opacity as a 6 minute average, during a 30 minute observation period is a violation of OAC rule 3745-17-07(B).

Actions:

Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

In addition to the information requested above, Ohio EPA also requests that CSC explain the specific problem(s) with B-3216 and the associated capture system for P901 and P902, whether the problem(s) have been fixed, what measures CSC has taken to resolve the problem(s), an estimated duration for each problem, and quantity of excessive emissions resulting from each problem (in tons).

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2. Findings: P046: Pepset Core Machine #1 vented to baghouse B-3813

On March 7, 2007, the Pepset Core Machine #1 (P046) and associated equipment (sand bins, mill) were observed in operation by Ohio EPA staff. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements in the effective Title V. Specifically, the silo(s) above P046 periodically emitted a large dust cloud that slowly expanded and wafted away from the silo. CSC operators explained that this happens during filling of the bin. Ohio EPA staff also witnessed a steady stream of dust emitted from an elbow covered in duct tape. CSC staff said they would work on it.

The sand feed chute/muller/mixer arm used to blend the resin and sand during sand dispensing was emitting a steady stream of fugitive dust from the point of sand release. The fugitive particulate was released during filling of the mold and after filling of the mold had stopped. No fugitive emissions capture hooding was seen.

A green vessel south of the P046 mixing platform periodically released a loud burst of pressurized air and dust. The dust cloud expanded and slowly wafted away from the vessel. CSC staff explained that they would take care of this problem.

The Title V permit and applicable PTI specify that emissions must be vented to baghouse B-3657. During the site visit, Ohio EPA discovered that P046 has independent sand bins from other Pepset mixers and that the emissions are directed to baghouse B-3813, not B-3657.

The effective Title V permit states the following:

"The permittee shall eliminate visible fugitive PE using the following measures:

i. use of an enclosure on the sand bin to achieve a capture efficiency sufficient to eliminate fugitive particulate emissions;

ii. use of a resin ribbon blender on the sand feed chute to achieve a capture efficiency sufficient to eliminate fugitive particulate emissions during core mold making; and

iii. the PE from the sand bin shall be vented to baghouse B-3657.

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The operation of the pepset core machine 1 shall not result in visible emissions of fugitive dust from any non-stack egress point from the foundry building housing this emissions unit, including, but not limited to: doorways, windows and roof."

In addition, the methods of minimizing emissions specified in the RACM areas 20, 21 and 22 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM studies specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Not eliminating visible fugitive particulate emissions in accordance with the existing Title V permit are considered violations of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Buckeye Steel Castings was issued a Consent Order by the Court of Common Pleas, Franklin County, Ohio, on August 30, 1996, which stated the following in V. Injunction, A.10:

"Buckeye Steel Castings agrees and is permanently and immediately enjoined and ordered to comply with all terms and conditions of all Permits to Install and Permits to Operate which are issued to it for air contaminant sources at the Facility."

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to

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achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

In addition, please re-examine the existing control equipment for this emissions unit along with the equipment referenced in the applicable PTI and Title V. If necessary, provide the correct baghouse that controls each of these emissions units and the associated equipment. If necessary, please submit a modification to the applicable PTI and ensure the correct baghouse is referenced in the most recent Title V permit application.

3. Findings: P047: Pepset Core Machine #2 vented to baghouse B-3657
P048: Pepset Core Machine #3 vented to baghouse B-3657
P049: Pepset Core Machine #4 vented to baghouse B-3657
P051: Pepset Core Machine #6 vented to baghouse B-3657

On March 7, 2007, Pepset Core Machines #2, 3, 4 and 6 (P047, P048, P049, P051) were observed in operation by Ohio EPA staff. CSC staff indicated that these emissions units vent to baghouse B-3700, however, the dust collector list provided to Ohio EPA on December 8, 2006, states that baghouse B-3813 controls the core room. Both of these baghouses are different than the baghouse specified in the Title V permit.

On April 16, 2007, Pepset Core Machine #2 (P047) was observed in operation by Ohio EPA staff. During filling of a core, excessive fugitive emissions/fumes were observed from the loading arm. Ohio EPA staff and CSC staff were unable to identify whether the fugitives were sand or atomized resin.

The effective Title V permit states the following for P047:

"The permittee shall eliminate visible fugitive PE using the following measures:

i. use of an enclosure on the sand bin to achieve a capture efficiency sufficient to eliminate fugitive particulate emissions;

ii. use of a resin ribbon blender on the sand feed chute to achieve a capture efficiency sufficient to eliminate fugitive particulate emissions during core mold making; and

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iii. the PE from the sand bin shall be vented to baghouse B-3657.

The operation of the pepset core machine 1 shall not result in visible emissions of fugitive dust from any non-stack egress point from the foundry building housing this emissions unit, including, but not limited to: doorways, windows and roof."

In addition, the methods of minimizing emissions specified in the RACM areas 20, 21 and 22 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM studies specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Not eliminating visible fugitive particulate emissions in accordance with the existing Title V permit are considered violations of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitute a violation of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

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In addition, please re-examine the existing control equipment for this emissions unit along with the equipment referenced in the applicable PTI and Title V. If necessary, provide the correct baghouse that controls each of these emissions units and the associated equipment. If necessary, please submit a modification to the applicable PTI and ensure the correct baghouse is referenced in the most recent Title V permit application.

4. Findings: P052: Pepset Core Machine #7 vented to baghouse B-3657

On March 7, 2007, Pepset Core Machine #7 (P052) was observed by Ohio EPA staff to be decommissioned with parts removed for other core machines.

Actions:

Ohio EPA requests that CSC submit a shutdown notification and request to withdraw applicable permits for P052 if CSC does not intend to use the unit in the future.

5. Findings: P053: Cold Box Core Machine 1 vented to Dakota wet acid scrubber B-3897 and baghouse B-3700
P056: Cold Box Core Machine 2 vented to Dakota wet acid scrubber B-3897 and baghouse B-3700
P057: Cold Box Core Machine 3 vented to Dakota wet acid scrubber B-3897 and baghouse B-3700

Emissions unit P053 is permitted under PTI 01-08082 and the current Title V permit. Emissions units P056 and P057 were permitted in PTI 01-08896. Neither of these emissions units was included in the current Title V permit in 2002 since they were installed after issuance of the Title V. All three emissions units perform the same operation and vent to the common wet acid scrubber (B-3897) and baghouse (B-3700).

The following observations of these emissions units, associated sand handling, associated curing ovens and control equipment indicate these units are not in compliance with permit requirements.

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During April 16, 2007, site visit:

- CSC staff explained that P053, P056 and P057 had been simultaneously operating prior to Ohio EPA arrival (during the first shift), however only P053 was observed in operation during the site visit (during second shift).
- Ohio EPA staff observed P053 in operation with excessive fugitive emissions from the pneumatic sand system feeding.
- During P053 core making a strong odor was noted by both Ohio EPA staff and CSC staff. CSC staff indicated that it was difficult to keep all of the catalyst/ammonia in the enclosure during core making.
- The core was subsequently moved to a heated curing tunnel. The curing tunnel did not have a capture/control system and fugitive emissions were observed from the tunnel.
- After the curing tunnel, the cores were placed on the floor and sprayed with a foundry wash.
- An Ohio EPA staff member was also examining scrubber B-3897 during the observations specified above.
- Scrubber B-3897 was not operating during core making on April 16, 2007, as demonstrated by electronic records provided by CSC staff to Ohio EPA staff.
- An investigation of the scrubber, while shutdown and after it was started back up, indicated that it was incapable of achieving the control efficiency specified in applicable permits (PTIs and TV).
- After the scrubber was restarted the water pressure was 1.6 inches of water.

Data logs for emissions units P053, P056 and P057, and discussions with CSC staff establish the following:

- Interlocks required by all applicable permits were never installed.
- Monitoring and recordkeeping data for the core box machines and scrubber have been recorded electronically since March 12, 2006. CSC staff was unable to provide recordkeeping for the core box machines and scrubber prior to March 12, 2006.
- Emissions units P056 and P057 began operation in September 2006.
- CSC staff stated that the core box machines began using a different catalyst in late April 2007 and that the electrical interlocks had been installed after Ohio EPA's April 17, 2007, site visit.

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Listed below is a summary of applicable permit requirements for which Ohio EPA is unable to determine compliance, are not being recorded or are not being maintained.

Part III.A of PTI 01-08896 for emissions units P056 and P057 includes the following:

- II.1: core production limit for first 12 months and rolling summation thereafter,
(Ohio EPA is unable to determine compliance with this limitation.);
- II.2: vent all TEA to scrubber, electrical employ lock-out to ensure maximum capture/control,
(Ohio EPA documented operation of these emissions units without operation of the scrubber. In addition, the electrical lockout was never installed.);
- II.4: pressure drop across scrubber between 2 to 8 inches of water,
(Ohio EPA reviewed the post March 12, 2006, electronic records and has documented consistent operation below 2 inches of water.);
- II.5: water flow rate to scrubber maintained not less than demonstrated during performance test,
(CSC has not conducted testing in accordance with this PTI.);
- II.6: vent all PE during pneumatic transport to baghouse, pressure drop across baghouse between 2 to 10 inches of water,
(Ohio EPA and CSC staff have documented pressure drop and operational issues with B-3700.);
- III.1.a-b: core production rate both monthly and per rolling, 12-month summation,
(CSC stated that they do not record this information.);
- III.2.a: pH of scrubber per 8 hour shift,
(Prior to March 12, 2006, CSC recorded pH once per day, not once per shift.);
- III.2.b: log of operating time for capture device, control device and emissions unit,
(CSC does not maintain this information.);
- III.3.a: pressure drop across the scrubber,
[CSC records the "system pressure" as opposed to the scrubber pressure drop. On March 12, 2006, electronic monitoring was installed and began operation. Therefore, the scrubber pressure drop (inches of water) is now recorded electronically, however the manual daily paper recording continues to incorrectly record "system pressure" (pounds per square inch-PSI) as pressure drop across the scrubber. Ohio EPA

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has no indication that pressure drop across the scrubber was ever recorded properly prior to March 12, 2006. If this is correct, then all previous recordkeeping and reporting of pressure drop across the scrubber is invalid.]

- III.3.c: log of operating time for capture device, control device and emissions unit,
(CSC does not maintain this information.);
- III.4.b: log of downtime for control device when emissions unit is in operation,
(CSC does not maintain this information.);
- III.5.a-c: stack visible emission color, duration and corrective actions,
(CSC does not maintain this information.);
- III.6: monthly inspections of capture system, log of defects, deficiencies, dates and repairs,
(CSC has not performed or recorded these monthly inspections.);
- IV.1: deviation report obligations,
(Ohio EPA has documented numerous deviations from monitoring and recordkeeping not specified in the appropriate quarterly deviation report.);
- IV.3.a-e: monitoring plan for control of TEA,
(CSC has not submitted this plan. However, on May 23, 2007, CSC submitted an "Operation and Maintenance Plan" in accordance with 40 CFR Part 63, Subpart EEEEE. This plan has not yet been reviewed to determine acceptability as defined in the MACT. This plan also included some of the information required by the above referenced section of PTI 01-08896. If CSC intends to use this plan to satisfy obligations in PTI 01-08896, then please resubmit the necessary information.); and
- V.1.b: compliance test within 6 months of startup,
(CSC has not completed compliance testing for these emissions units.).

Part III.A of Title V issued December 18, 2002, for emissions unit P053 includes the following:

- I.2.a: enclosure on sand bin to eliminate fugitive PE,
(Ohio EPA staff documented fugitive emissions from pneumatic loading.);
- II.1: pressure drop across baghouse between 2 to 10 inches of water,
(See PTI requirement II.6 above.);

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- II.3: vent all TEA to scrubber, electrical employ lock-out to ensure maximum capture/control,
(See PTI requirement II.2 above.);
- II.4: pressure drop across scrubber between 2 to 8 inches of water,
(See PTI requirement II.4 above.);
- III.1: log of downtime for control device when emissions unit is in operation,
(CSC does not maintain this information.);
- III.2.a: pressure drop across the scrubber,
(See PTI requirement III.3.a above.);
- III.2.b: pH of scrubber per 8 hour shift,
(See PTI requirement III.2.a above.);
- III.2.c: log of operating time for capture device, control device and emissions unit,
(See PTI requirement III.3.c above.);
- III.3.a-c. stack visible emission color, duration and corrective actions,
(See PTI requirement III.5.a-c above.);
- IV.1. deviation report obligations,
(See PTI requirement IV.1 above.).

(Obligations specified in PTI 01-08082 for emissions unit P053 is consistent with the Title V requirements specified above.)

On November 16, 2000, CSC submitted an update to their Preventive Maintenance and Malfunction Abatement Plan (PMMAP) in accordance with PTI 01-08082 requirements. The update included the Weekly Monitoring Log (Form 3) titled "Scrubber B-3897 Dakota Scrubber – EMI Core Blower" and the Monthly Monitoring Log (Form 50) titled "Monthly Inspection, Lubrication, and Maintenance Sheet for B-3897, Dakota Scrubber".

During the compliance evaluation CSC was unable to provide these forms however, during the week of April 16, 2007, Ohio EPA staff requested all monitoring and recordkeeping as specified in applicable permits and the PMMAP for the day. In addition, Ohio EPA asked how the data was collected and recorded. CSC staff explained that the pH and system pressure are recorded on a piece of scrap paper during the daily dust collector walk through. The rest of the information is completed when the pH and system pressure are copied to the PMMAP form (Form 3). CSC staff explained that the monthly form (Form 50) is

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never completed. The ability to conduct a thorough evaluation of the emissions unit and control equipment necessary to accurately complete these forms appears questionable due to the lack of judicious documentation.

An Air Toxic emissions analysis was conducted for both PTI 01-08082 and PTI 01-08896. The analysis was based upon operation of the emissions units as specified in the applicable permit applications. The compliance evaluation for these emissions units establishes that they no longer operate in such a way that the required capture or control efficiencies are achieved. In addition, CSC has expressed that a new catalyst is now being used in these emissions units. Due to changes in the composition of materials, lack of capture, lack of control and the emissions units not operating in accordance with applicable permits and permit applications, Ohio EPA is currently unable to determine compliance with Ohio's Air Toxics Policy.

A stack test completed on February 6, 2001, on wet scrubber (B-3897) demonstrated an emissions rate of 3.24 pounds of organic compounds (OC) per hour from emissions unit P053. P053 has an emissions limitation of 4.1 pounds OC per hour. PTI 01-08896 was issued August 9, 2005, for emissions units P056 and P057. This PTI requires a compliance demonstration within six months of startup. CSC staff explained that P056 and P057 began operation in September of 2006. To date, the required compliance demonstration has not taken place and Ohio EPA has not received an Intent to Test (ITT) notification.

Violations:

Failure to comply with the existing Title V and PTI permits are considered violations of ORC rule 3704.05(C).

Not eliminating visible fugitive particulate emissions in accordance with the existing Title V permit are considered violations of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitute a violation of the August 30, 1996, Consent Order.

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Actions:

Ohio EPA requests that CSC submit the following:

- A compliance plan specifying how and when CSC will comply with the monitoring and recordkeeping specified in existing PTIs and Title V permits, and how CSC will achieve and maintain required capture and control efficiencies.
- A comprehensive report specifying all maintenance, modifications and repairs made to these three emissions units and associated capture/control equipment performed since March of 2003. This report should include dates for all actions and descriptions as necessary. This report can be submitted with the compliance demonstration test report specified below.
- An air dispersion modeling analysis in accordance with Ohio EPA's Air Toxics Policy. Please conduct the analysis for the three emissions units combined for both the TEA catalyst and any replacement catalyst currently in use.
- Please submit an ITT notification, within 60 days of receipt of this letter, to demonstrate compliance with emissions limitations specified in applicable permits. In addition to the testing requirements specified in section Part III.A.V.2 of PTI 01-08896, Ohio EPA requests the following:
 1. Permittee shall operate all three emissions units during the entire test.
 2. Permittee shall demonstrate 100% capture of OC from all three emissions units. (per PTI 01-08896 and PTI 01-08082)
 3. Permittee shall determine OC emissions rates for each emissions unit during concurrent operation of the other two emissions units.
 4. Permittee shall determine scrubber control efficiency of TEA, or other currently employed catalyst.
 5. An acceptable ITT should contain additional detailed records of all maintenance performed on any process equipment or control device

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associated with the emissions unit to be tested. These records shall contain at a minimum, the following information:

- nature and description of the maintenance, repair, and or replacement, hereafter referred to as "maintenance", performed;
 - date or dates the maintenance was performed;
 - purpose of the maintenance; and
 - duration of the problem/event that initiated maintenance.
6. The final test report should contain the above information describing all maintenance performed on any process equipment or control device associated with tested emissions units/operations/processes from the date of receipt of this letter until the test date.
- Provide an explanation for whether or not use of a new catalyst meets the definition of "Modify or modification", as defined in OAC rule 3745-31-01(PPP), and the definition of "New Source", as defined in OAC rule 3745-31-01(TTT). If appropriate, submit a PTI application, calculations and EAC forms for these emissions units including capture efficiencies, calculations, potential emissions and requested emission limitations.

6. Findings: P033: National Sand Dryer (B-2790) vented to baghouse B-3597.

On March 15, 2007, the B-2790 National Sand Dryer (P033) was observed in operation by Ohio EPA staff. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements of the effective Title V. The fugitive emissions generated by P033 reduced visibility such that identification of specific hooding and/or equipment was impossible. The excessive fugitive emissions were observed flowing into the plant and outside of the building via open windows. Visible emissions readings (Method 9 and Method 22) were conducted on March 15, 2007, on open windows adjacent to 3F Mill and Four Storage Silos (P904). The Method 9 reading documented fugitive emissions of 36% as a 3-minute average. The Method 22 reading documented continuous fugitive emissions for 6 minutes.

The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on

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February 4, 1991. These measures shall include, but not be limited to, the following:

i. the use of hooding, in RACM area 19, at the sand conveyors and elevators and the use of enclosures at the storage bins and mill to achieve a minimum 99% capture efficiency of potential emissions of fugitive dust; and

ii. all fugitive dust captured within the RACM area shall be vented to the baghouse B-3597.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 19, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 19 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

On May 24, 2007, during the site visit, both emissions unit P033 and the associated baghouse, B-3597, were not in operation. Ohio EPA staff documented the pressure drop for the baghouse to be 2 inches of water. Without P033 or the fan for B-3597 in operation there should be no pressure drop.

Violations:

Not eliminating visible fugitive particulate emissions in accordance with the existing Title V permit are considered violations of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Allowing visible fugitive particulate emissions in excess of 20% opacity, as a 3 minute average, during a 30-minute observation period is a violation of OAC rule 3745-17-07(B)(1).

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Failure to comply with the terms and conditions of applicable installation and/or operating permits constitute a violation of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

In addition, the updated Preventive Maintenance and Malfunction Abatement Plan should include a maintenance plan specifying how CSC will prevent problems, detect problems quickly, and maintain proper calibration of pressure drop instrumentation in the future.

7. Findings: P904: 3F Mill and Four Storage Silos vented to baghouse B-3820

On March 15, 2007, the 3F Mill and Four Storage Silos (P904) were observed in operation by Ohio EPA staff. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements in the effective Title V. Specifically, during operation excessive fugitive emissions were observed from this unit. Due to the amount of fugitive emissions generated by P904, the lack of visibility prevented identification of specific hooding and equipment from which the fugitive emissions originated.

Visible emissions readings (Method 9 and Method 22) were conducted on March 15, 2007, on open windows adjacent to P904. The Method 9 readings documented fugitive emissions in excess of 36% as a 3-minute average. The Method 22 reading documented continuous fugitive emissions for 6 minutes.

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The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on January 30, 1991. These measures shall include, but not be limited to, the following:

i. the use of hooding, in RACM areas 17 and 18, at the 3F mill and four storage silos to achieve a minimum 99% capture efficiency of potential emissions of fugitive dust; and

ii. all fugitive dust captured within the RACM area shall be vented to baghouse B-3820.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM areas 17 and 18, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 17 and 18 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM studies specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

During the site visit on March 15, 2007, Ohio EPA staff observed multiple problems with B-3820 indicating that the baghouse control efficiency had been compromised. Specifically, the baghouse pressure drop readings, in inches of water, were 0.7 (compartment 1), 2.3 (compartment 2) and 1.1 (compartment 3). The Title V permit specifies an operating range of 2-10 inches of water. In addition, two of the collection bags were full and the third was roughly 2/3 full. The baghouse control panel doors for compartments 1 and 2 were open and the interior circuit panels were covered in wet black dust. These circuit panels control the pulsing jets for the bags. While inspecting B-3820, no pulsing of any bag occurred.

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During a site visit on April 10, 2007, Ohio EPA staff observed a problem with B-3820 indicating that the baghouse control efficiency had been compromised. Specifically, the baghouse pressure drop readings, in inches of water, were 6.5 (compartment 1), 5.6 (compartment 2) and 2.5 (compartment 3). Compartment 1 manometer was observed by Ohio EPA staff to have gauge fittings that allowed ambient air to affect the pressure reading (they should be maintained to prevent this). After adjusting the gauge to read properly, the pressure drop read 9.6 inches of water. This correction was mentioned to CSC staff.

During a site visit on May 24, 2007, Ohio EPA staff observed a problem with B-3820 indicating that the baghouse control efficiency had been compromised. Specifically, the baghouse pressure drop readings, in inches of water, were 4.8 (compartment 1), 6.9 (compartment 2) and 7.1 (compartment 3). Compartment 3 manometer was observed by Ohio EPA staff to have a closed positive pressure valve (it should be open). After opening the valve, the pressure drop slowly rose to 8.2 inches of water and continued to rise.

The applicable Title V permit specifies a pressure drop range of 2 to 8 inches of water for the B-3820 to ensure proper control efficiency.

CSC conducted a stack test of B-3820 controlling P904 on May 13, 2004. This compliance demonstration established an average emissions rate of 0.023 gr/dscf and a flow rate of 68,154 scfm. Both the emissions rate and the flow rate failed to comply with the August 30, 1996, Consent Order.

The August 30, 1996, Consent Order states the following:

“11. Buckeye Steel Castings agrees and is hereby enjoined and ordered to design, construct, and thereafter operate an 80,000 scfm baghouse for its 3-F Mill in accordance with paragraphs 12 through 16 of this Order.

12. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 6, 1996, to complete the design of an 80,000 scfm baghouse for its 3-F Mill. The 80,000 scfm capacity of this baghouse shall be allocated such that: 35,000 scfm will serve to replace existing baghouse capacity; 45,000 scfm will serve to increase ventilation for the 3-F Mill area to reduce particulate emissions into the ambient air. The particulate emissions from the 80,000 scfm baghouse for the 3-F Mill shall not exceed an allowable emissions rate of 0.020 grain per dry standard cubic foot (“grain/dscf”) of exhaust gases...”

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Violations:

Not eliminating visible fugitive particulate emissions and not operating control equipment in accordance with the existing Title V permit are considered violations of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Allowing visible fugitive particulate emissions in excess of 20% opacity, as a three-minute average, during a 30-minute observation period is a violation of OAC rule 3745-17-07(B)(1).

Failure to comply with the terms and conditions of applicable installation and/or operating permits, failure to properly operate control equipment and exceeding the emissions limitations constitute violations of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how Columbus Steel Castings will achieve and maintain the required capture efficiencies flow rate and emissions limitation. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

In addition, the updated Preventive Maintenance and Malfunction Abatement Plan should include a maintenance plan specifying how CSC will prevent problems, detect problems quickly, and maintain proper calibration of pressure drop instrumentation in the future.

Please submit an ITT notification, within 60 days of receipt of this letter, to demonstrate compliance with emissions limitations specified in the applicable Title V permit and August 30, 1996, Consent Order. In addition to the testing

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requirements specified in section Part III.A.V.1.b of the applicable Title V permit Ohio EPA requests the following:

1. Emissions testing to determine the PM-10 (USEPA Methods 1-4, 201 or 201A, and 202) emissions rates from B-3820. Alternative methods may be used with prior approval from the Ohio EPA, Central District Office.
2. All testing specified above shall be performed in accordance with the requirements of section III.A.V(1)(b) - (d) of the applicable section of the Title V permit.
3. An acceptable ITT should contain additional detailed records of all maintenance performed on any process equipment or control device associated with the emissions unit to be tested. These records shall contain at a minimum, the following information:
 - nature and description of the maintenance, repair, and or replacement, hereafter referred to as "maintenance", performed;
 - date or dates the maintenance was performed;
 - purpose of the maintenance; and
 - duration of the problem/event that initiated maintenance.
4. The final test report should contain the above information describing all maintenance performed on any process equipment or control device associated with tested emissions units/operations/processes from the date of receipt of this letter until the test date.

8. Findings: F006: 1693 Mold Making and Sand Preparation

On March 7, 2007, the mold making portion of 1693 Mold Making and Sand Preparation was observed in operation by Ohio EPA staff. At this time no fugitive emissions were noted during loading of sand into cope and drags (mold making).

On March 15, 2007, the lump breaking equipment, vibrating conveyor belts and various other conveyor belts were operating. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements in the effective Title V. Specifically, during operation excessive fugitive emissions were observed from all conveyor belts, vibrating belts and the lump breaking equipment.

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The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on February 4, 1991. These measures shall include, but not be limited to, the following:

i. the use of hooding in RACM areas 14 (sand handling) and 15 (sand unloading and storage) to achieve a minimum 70% capture efficiency, and in RACM area 16 (sand and binder preparation mills) to achieve a minimum 90% capture efficiency of potential emissions of fugitive dust; and

ii. all fugitive dust captured within the RACM areas shall be vented to the rotoclone wet scrubber B-3032, which shall achieve an outlet loading of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or no visible particulate emissions from the scrubber exhaust stack, whichever is less stringent.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM areas 14, 15, and 16, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 14, 15 and 16 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

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Failure to comply with the terms and conditions of applicable installation and/or operating permits constitute a violation of the August 30, 1996 Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

9. Findings: F007: 1693 Mold Pouring and Cooling

On numerous site visits the 1693 Mold Pouring and Cooling (F007) was observed in operation by Ohio EPA staff. No fugitive emissions were observed leaving the building at this time.

Actions:

No further actions necessary.

10. Findings: P012: 1693 Shakeout vented to scrubber B-3032

On March 15, 2007, and November 29, 2006, the 1693 Shakeout (P012) was observed in operation by Ohio EPA staff. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements in the effective Title V. Specifically, during operation excessive fugitive emissions were observed from the southern shakeout table and the sub-grade conveyor belt transporting sand to F006. No capture of the fugitive emissions could be seen.

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The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on February 4, 1991. These measures shall include, but not be limited to, the following:

i. the use of side draft hoods in RACM area 13 (shakeouts), to achieve a minimum 60% capture efficiency of potential emissions of fugitive dust; and

ii. all fugitive dust captured within the RACM area shall be vented to the wet scrubber B-3032, which shall achieve an outlet loading of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or no visible particulate emissions from the scrubber exhaust stack, whichever is less stringent.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 13, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 13 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitute a violation of the August 30, 1996 Consent Order.

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Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

11. Findings: P011: 2600 Moldmaking and Sand Preparation vented wet scrubber B-3033, baghouse B-3330 and baghouse XYZ

On April 10, 2007, April 17, 2007, April 26, 2007, and May 24, 2007, P011 was observed in operation by Ohio EPA staff. During observations of this emissions unit and associated equipment Ohio EPA staff witnessed excessive fugitive emissions. The fugitive emissions were not being captured in accordance with the requirements of the effective Title V permit. In addition, numerous enclosures specified in the effective Title V permit had been removed and/or poorly maintained directly leading to fugitive emissions being released into the building and subsequently emitted as fugitive emissions into the ambient air. In addition, specific control equipment including a baghouse, silo bin vents and the wet scrubber had not been maintained and/or operated properly.

Additional specific findings are identified below:

- On April 16, 2007, the manual load crusher generated excessive fugitive emissions during loading of sand. The fugitive emissions filled the immediate vicinity and obscured subsequent sand processing equipment.
- On April 16, 2007, control equipment ductwork collecting emissions from the manual load crusher and associated equipment was noted to have been disconnected.
- On April 16, 2007, sand processing equipment controlled by wet scrubber B-3033 was in operation while the water recirculation pump was not operating.

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The scrubber water pressure was noted at 0.0 psi. CSC staff explained to Ohio EPA staff that they were aware of problems with the pump and that a replacement was on order. In addition, CSC staff explained that this was not a malfunction of the scrubber. While inspecting the equipment, CSC maintenance arrived to replace the water pump.

- On April 17, 2007, the 2600 mold making sand pouring arm was continuously releasing sand and fugitive emissions regardless of whether sand pouring was occurring. None of the fugitive emissions were captured by hooding.
- On April 17, 2007, the shakeout table was in operation. Sand molds were intentionally dragged along the edge of the table causing much of the sand to drop to the ground. Once on the table, the overhead crane intentionally hung half of the mold over the edge of the table allowing the rest of the sand to fall to the ground. As the sand falls and impacts the ground, fugitive emissions are generated that are not captured by the shakeout table hooding. There was no noticeable draw of fugitive dust into the shaker table hooding.
- On April 17, 2007, residual sand from a previous load was creating fugitive emissions from the sand processing equipment behind the manual load crusher.
- On April 17, 2007, the 2600 mold making baghouse (no I.D.) magnahelic gauge was completely covered in dust and not functioning. During a baghouse pulse, fugitive dust was emitted from seams and the top of the baghouse and from the collection bag underneath which over inflated during the pulse. After the pulse, the collection bag returned to a negative pressure.
- On April 17, 2007, during mold making, significant fugitive emissions billowed out of the top of the associated sand bin and baghouse. The fugitive emissions billowed throughout the area.
- On April 17, 2007, compressed air cleaning of empty molds created excessive fugitive emissions.
- On April 17, 2007, a small stack associated with the two sand silos outside the building near the 2600 sand system was seen periodically venting roughly 100% opacity. CSC staff was unaware of the purpose of the pipe or where the emissions were coming from.

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- On April 26, 2007, CSC staff explained that the unknown silo stack was part of the pneumatic sand transfer system and should be venting to a bin vent. CSC staff further explained that the bin vents were either non-functional or non-existent but would be fixed.
- On May 24, 2007, the wet scrubber B-3033 was releasing droplets of dirt and water from the exhaust stack indicating a significant problem. Ohio EPA staff noted the scrubber sludge conveyor was drawing no power indicating that the sludge conveyor was not operating. The sludge conveyor removes collected particulate/solid material from the scrubber water. Most emissions units that vent to the scrubber were noted to be in operation.
- On May 24, 2007, Ohio EPA staff confirmed that the rotoconditioner vents to baghouse B-3330, and that all other sand processing equipment and the shakeout table vent to the wet scrubber. In addition, Ohio EPA staff confirmed that once the manual load crusher is loaded, all subsequent equipment needs to operate too.
- On May 24, 2007, loading of the manual load crusher generated excessive fugitive emissions. The fugitive emissions were emitted from every visible transfer point causing excessive fugitive emissions. As sand moved through the system equipment spilled sand onto the ground and emitted fugitive emissions into the ambient air. Capture hooding and ductwork was not sufficient to prevent fugitive emissions.
- On May 24, 2007, control equipment ductwork collecting emissions from the manual load crusher and associated equipment was again noted to have been disconnected.
- On May 24, 2007, CSC staff explained that the 2600 mold making baghouse bags had been replaced and that a noticeable improvement in indoor air quality was noted by employees.
- On May 24, 2007, compressed air cleaning of empty molds again created excessive fugitive emissions.
- On May 24, 2007, the silo bin vents were observed by Ohio EPA staff. The bin vents on each of the two silos did not appear to have been replaced recently. CSC staff explained that they would be in the near future.

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- On May 24, 2007, CSC staff again explained that the pneumatic sand vent pipe would either be directed back to the silos or receive a new control device.

The effective Title V permit states the following for P011:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on March 29, 1991. These measures shall include, but not be limited to, the following:

i. the use of hooding in RACM area 27 (2 coremaking and 1 moldmaking) to achieve a minimum 85% capture efficiency of potential emissions of fugitive dust;

ii. the use of enclosures in RACM area 28 (screen, sand cooler, magnetic separator and conditioner) to achieve a minimum 98% capture efficiency of potential emissions of fugitive dust; and

iii. all fugitive dust captured within the RACM areas shall be vented to the wet scrubber B-3033 and baghouse B-3330, which shall achieve an outlet loading of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or no visible particulate emissions from the exhaust stacks, whichever is less stringent.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM areas 27 and 28 including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM areas 23-28 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

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Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitutes a violation of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

Please submit an ITT notification, within 60 days of receipt of this letter, to demonstrate compliance with Part III.A.V.1.b of the applicable Title V permit. In addition to the requirements specified in the Title V permit, Ohio EPA requests the following:

1. During testing of B-3330 and B-3033, all emissions units/operations/processes that vent to these emissions units shall be operating at maximum capacity during the entire test.
2. Emissions testing to determine the OC (USEPA Methods 1-4, 18, 25, or 25a) and PM-10 (USEPA Methods 1-4, 201 or 201A, and 202) emissions rates from wet scrubber B-3033 and baghouse B-3330 shall be conducted. Alternative methods may be used with prior approval from the Ohio EPA, Central District Office.

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3. Emissions testing to determine the PM and PM-10 (USEPA Methods 1-4, 5, 201 or 201A, and 202) emissions rates from the baghouse that controls the moldmaking operation. Alternative methods may be used with prior approval from the Ohio EPA, Central District Office.
 4. All testing specified above shall be performed in accordance with the requirements of section III.A.V(1)(b) - (d) of the applicable section of the Title V permit.
 5. An acceptable ITT should contain additional detailed records of all maintenance performed on any process equipment or control device associated with the emissions unit to be tested. These records shall contain at a minimum, the following information:
 - nature and description of the maintenance, repair, and or replacement, hereafter referred to as "maintenance", performed;
 - date or dates the maintenance was performed;
 - purpose of the maintenance; and
 - duration of the problem/event that initiated maintenance.
 6. The final test report should contain the above information describing all maintenance performed on any process equipment or control device associated with tested emissions units/operations/processes from the date of receipt of this letter until the test date.
12. Findings: F008: 2600 Pouring and Cooling
- On June 29, 2006, the 2600 Pouring and Cooling (F008) were observed in operation by Ohio EPA staff. No fugitive emissions were observed leaving the building at this time.
- Actions:
- No further actions necessary.
13. Findings: F005: Moldmaster Mold making (Insignificant in TV)
P009: Moldmaster Mold making and Sand Prep vented to baghouse XYZ

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On April 2, 2007, the Moldmaster (MM) Sand Preparation and Mold Making (F005 or P009) was observed in operation by Ohio EPA staff. Consistent with Finding no. 4 in the December 19, 2006, Notice of Violation letter, manual loading of the mill generated excessive emissions of fugitive dust.

The Title V permit identifies both P009 and F005 as MM Mold making. Both Ohio EPA and CSC staff were unable to distinguish which equipment was part of each specific unit.

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

Actions:

Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

In addition, Ohio EPA requests that CSC clarify the differences between these two emissions units or consolidate these emissions units in the next Title V permit application.

14. Findings: F009: Moldmaster Pouring and Cooling

On March 7, 2007, and March 27, 2007, Moldmaster (MM) Pouring and Cooling operation (F009) was observed in operation by Ohio EPA staff. Consistent with Finding no. 5 in the December 19, 2006, Notice of Violation letter, capture and control were not sufficient to eliminate fugitive emissions in accordance with the effective Title V permit. Method 22 readings were conducted on March 27, 2007, documenting fugitive emissions and on March 7, 2007, fugitive emissions were observed leaving the building housing this emissions unit.

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

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Actions:

Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

15. Findings: P906: Moldmaster Casting Processing System
(including wheelabrator shotblast) vented to baghouses B-3700, B-3639, B-3640 and B-3820
P908: Moldmaster Punchout/Shakeout Area vented to baghouses B-3700 and B-3639

On numerous days since the December 19, 2006, Notice of Violation letter P906 and P908 have been observed in operation by Ohio EPA staff. All observations have been consistent with Finding no. 2 in the December 19, 2006, Notice of Violation letter, regarding excessive fugitive particulate emissions. Method 22 readings were conducted on March 27, 2007, documenting fugitive emissions leaving the building. Method 9 readings were conducted on March 30, 2007, on an overhead vent above the P906/P908 area in excess of 28% opacity as a 6-minute average. Method 9 readings were conducted on April 2, 2007, on fugitive emissions leaving the Moldmaster (MM)/East End alley in excess of 44% opacity as a 3-minute average.

Additional specific findings are identified below:

- On March 7, 2007, an overhead conveyor in the P906 area was observed dropping a large amount of sand roughly 20 feet to the floor below generating excessive fugitive emissions. CSC staff stated to Ohio EPA staff that the belt was blocked and needed to be fixed.
- On March 20, 2007, the entire MM and East End were generating thick fugitive emissions. The sub-grade conveyors moving and shaking sand in the MM/East End were operating with minimal capture efficiency. The P906 manipulator arm process was operating without the front wall of the enclosure through which fugitive emissions were observed billowing throughout the area. The P908 equipment was also operating and did not appear to be capturing any of the fugitive emissions generated by the process.

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- On March 20, 2007, the P906 wheelabrator monorail shotblaster was observed in operation. The equipment was emitting excessive fugitive emissions from the top of the unit which rolled out and down to the floor level. In addition, on the backside of the emissions unit an open chute was dropping shot roughly 4 feet into an open bin. The open chute was also generating excessive emissions which were observed billowing inside the building and out a rolling overhead door to the ambient air in the East End alley.
- On March 27, 2007, as observed from adjacent property, a significant amount of fugitive emissions were observed leaving the building through the MM/East End alley. At times the baghouses in the alley were obscured by the fugitive emissions. Two Ohio EPA staff and CSC staff witnessed the excessive emissions from property adjacent to CSC. CSC staff stated to Ohio EPA staff that the problem would be "looked into".
- During the March 27, 2007, site visit breakout operations commenced in the MM area and visibility of MM equipment, as viewed from the furnace area was immediately obscured. Visibility continued to be obscured while the MM equipment operated.
- On April 2, 2007, a significant amount of fugitive emissions were observed leaving the building through open doors and inadequate enclosures in the MM/East End alley. The P906 wheelabrator monorail shotblast was generating excessive fugitive emissions identical to the March 20, 2007, site visit.
- On April 2, 2007, during lunch break shutdown, observation of the 30 degree enclosed conveyor that moves sand from P906 below a walkway to P905 was observed. The conveyor had 6 inch diameter open ports roughly 12 feet apart (roughly 5 total) that were not vented to control equipment as required by applicable permits.
- On April 16, 2007, during the site visit CSC staff expressed to Ohio EPA staff that one of the three fans, responsible for capturing fugitive emissions and sending them to baghouse B-3700, was not operating. CSC staff stated that a malfunction was not taking place because pressure drop was being maintained and no visible emissions were seen from the stack. Prior to leaving the facility, Ohio EPA staff was notified that the fan had been fixed.

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- On April 26, 2007, during operation of the Punchout/Shakeout operation, Ohio EPA staff observed excessive fugitive emissions and minimal capture of the fugitives. In addition, sand conveyor transfer points were emitting fugitive emissions and did not appear to have any capture hooding or pick-up points.

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

Actions:

Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

If CSC believes that only two fans, instead of three, are necessary to achieve the capture and control efficiencies specified in applicable permits, then the respective emissions units and control equipment should perform compliance demonstrations under these conditions.

16. Findings: P906: Moldmaster Casting Processing System
(Moldmaster burn booths vented to baghouse B-3820)

On April 26, 2007, Ohio EPA staff observed the MM burn booth, vented to baghouse B-3820, in operation. The booth currently consists of three stations. The first station is used for knocking sand off of the casting followed by two stations used for burning of the castings.

During operation, the booths were observed emitting excessive fugitive emissions. The ductwork and draw that captures emissions for baghouse B-3820 was not sufficient to prevent fugitive emissions from escaping large openings on the front of each booth. Minimal fugitive emissions were captured during operation.

The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of best available technology (BAT) in accordance with the

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PTI application submitted on November 15, 1999. These measures shall include, but not be limited to, the following:

- i. the use of a partial enclosure, in RACM area 30, around the casting extractor, to achieve a minimum 98% capture efficiency of potential emissions of fugitive dust;*
- ii. the use hooding, in RACM area 30, above the 8 vibratory and belt sand conveyors, to achieve a minimum 90% capture efficiency of potential emissions of fugitive dust;*
- iii. the use of a total enclosure, in RACM area 30, around the Didion sand reclaimer, the monorail shotblaster, and the torch burning station to achieve a minimum 95% capture efficiency of potential emissions of fugitive dust; and*
- iv. all fugitive dust captured within the RACM area shall be vented to baghouses B-3700, B-3639 and B-3640.*

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 30, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 30 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please

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include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

17. Findings: P905: East End Sand System vented to baghouses B-3306 and B-3552

On numerous days since the December 19, 2006, Notice of Violation letter, P905 has been observed in operation by Ohio EPA staff. All of our observations have been consistent with Finding no. 6 in the December 19, 2006, Notice of Violation letter, regarding excessive fugitive particulate emissions. Method 22 readings were conducted on March 27, 2007, documenting fugitive emissions leaving the building. Method 9 readings were conducted on April 2, 2007, on fugitive emissions leaving the MM/East End alley in excess of 44% opacity as a 3-minute average.

Additional specific findings are identified below:

- On March 7, 2007, the lump breaking operation was operating and generating excessive fugitive emissions with minimal capture.
- On March 20, 2007, the Dideon equipment was operating and generating excessive fugitive emissions with minimal capture.
- On March 20, 2007, the entire MM and East End was generating thick fugitive emissions. The sub-grade conveyors moving and shaking sand near the MM/East End were capturing minimal emissions.
- On March 27, 2007, as observed from adjacent property, a significant amount of fugitive emissions were observed leaving the building through the MM/East End alley. At times the baghouses in the alley were obscured by the fugitive emissions. Two Ohio EPA staff and CSC staff witnessed the excessive emissions from property adjacent to CSC. CSC staff stated to Ohio EPA staff that the problem would be "looked into".

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- On April 2, 2007, a significant amount of fugitive emissions were observed leaving the building through open doors and inadequate enclosures in the MM/East End alley.
- On April 2, 2007, during shutdown the 30 degree enclosed conveyor that moves sand from P906 below the walkway to P905 had 6 inch diameter open ports roughly 12 feet apart (roughly 5 total). These ports are not vented to control equipment in accordance with applicable permits.

Violations:

Refer to the December 19, 2006, letter for a description of the violations.

Actions:

Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

18. Findings: East End Breakout

The December 19, 2006, Notice of Violation letter sent to CSC cited breakout operations taking place at the East End to be in violation of numerous state rules and the applicable Consent Order.

During a December 22, 2007, meeting and during subsequent site visits, CSC management and staff explained that breakout operations had ceased in the East End. In addition, the February 27, 2007, response letter from Christopher Jones, on behalf of CSC, stated that "CSC immediately ceased shakeout in this area of the plant..." and would submit the requested information prior to re-starting shakeout. In the February 27, 2007, letter CSC also asked whether the information requested by Ohio EPA (in December 19, 2006 letter) was necessary if CSC decides not to restart the process.

During the March 20, 2007, and April 2, 2007, site visits Ohio EPA staff observed large piles of sand and castings in the East End pit area. CSC staff explained to Ohio EPA staff that scrap castings continued to be broken out in the area and that a consultant was working on a PTI application for the process. To date, Ohio EPA has not received a PTI application for this process.

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Violations:

Refer to the December 19, 2006, letter for a description of the violations.

Actions:

Since breakout operations continue in the East End pit area, Ohio EPA again requests that CSC submit the information requested in the December 19, 2006, Notice of Violation letter.

19. Findings: P007: Monorail Shotblast (B-2497) vented to baghouse B-3922 (replaced baghouse B-2700)

On March 20, 2007, the Monorail Shotblast (P007) was observed in operation by Ohio EPA staff. Enclosures and hooding were not sufficient to capture fugitive emissions in accordance with the requirements in the effective Title V. Specifically, excessive fugitive emissions were observed primarily from the point where castings exit the booth. The fugitive emissions from this emissions unit created a distinct cloud of fugitives that slowly billowed south through the Industrial Finishing building.

Visible emissions readings were conducted on April 4, 2006, by Air Compliance Testing during compliance testing of this emissions unit. Air Compliance Testing documented fugitive emissions leaving the building for a period of greater than 51-minutes during the 3-hour test.

The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on February 27, 1991. These measures shall include, but not be limited to, the following:

- i. the use of an enclosure of the monorail with hooding in RACM area 30 to achieve a minimum 99% capture efficiency of potential emissions of fugitive dust; and*
- ii. all fugitive dust captured within the RACM area shall be vented to the baghouse B-2700, which shall achieve an outlet loading of not greater*

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than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or no visible particulate emissions from the baghouse exhaust stack, whichever is less stringent.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 30, including, but not limited to: doorways, windows and roof openings."

In addition, the methods of minimizing emissions specified in the RACM area 30 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

The Title V permit application submitted December 18, 2002, states that P007 was installed in July of 1980. CSC has not applied for a PTI for this emissions unit.

Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitutes a violation of the August 30, 1996, Consent Order.

Failure to obtain an appropriate PTI prior to installation of a new source constitutes a violation of OAC rule 3745-31-02(A).

Failure to obtain an appropriate PTI prior to installation constitutes a violation of the August 30, 1996, Consent Order.

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Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

In addition, please submit a PTI application and appropriate EAC form for this emissions unit along with any and all assumptions, calculations, citations and guidance utilized when completing any of the above forms and information submitted.

20. Findings: F010: Bolster/Frame/Industrial Finishing

On March 20, 2007, the Bolster/Frame/Industrial Finishing (F010) was observed in operation by Ohio EPA staff. No fugitive emissions were observed leaving the building at this time.

Actions:

No further actions necessary.

21. Findings: P030: Table Shot Blast (B-3121) in Industrial Finishing vented to B-3122

On March 20, 2007, the Table Shot Blast (P030) was witnessed to be present, but not operating, by Ohio EPA staff. CSC staff explained that this emissions unit rarely operates.

Actions:

No further actions necessary.

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22. Findings: K001: Bolster and Frame Rail Painting
K004: Bolster and Frame Paint Line

On March 20, 2007, the Bolster and Frame Rail Painting (K001) and Bolster and Frame Paint Line (K004) were observed by Ohio EPA staff, but not in operation. CSC staff explained that K004 was no longer used and that CSC intends to modify it prior to further use. Since K004 was not being used, CSC staff explained that all painting took place in the K001 paint area and that only water-based coatings were used.

Ohio EPA observed the K001 paint area and noted significant overspray on support rails and the floor.

On June 7, 2000, Ohio EPA issued PTI 01-08142 for the installation of K004 as a replacement for K001. The intent of this emissions unit was to replace K001 with a water-based coating operation equipped with a dry filtration system. Approval of emissions from K004 was dependent on a reduction in emissions from shutdown of K001.

Currently, both emissions units are permitted in the Title V permit.

Actions:

For K001 and K004, Ohio EPA requests that CSC clarify the current use, future intended use, use of water-based coatings, potential emissions of VOC, HAP and HAPs, control equipment and coating application method for each emissions unit. If CSC intends to operate both emissions units, please submit an appropriate PTI application that reflects this intent for both emissions units. Also, if CSC intends to only use water-based coatings, if necessary, please submit the appropriate permit application(s) or modifications to reflect this intent.

23. Findings: K002: #2 Foundry Paint Booth

On April 26, 2007, the #2 Foundry Paint Booth (K002) was viewed Ohio EPA staff. The emissions unit was not in operation and was equipped with a water curtain for control of overspray.

PTI 01-2930, issued November 28, 1990, specifies a Water Curtain as control equipment for K002, however, the Title V permit specifies use of a dry filter.

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Actions:

Ohio EPA requests that CSC update the Title V permit renewal application to reflect the appropriate control equipment.

24. Findings: P029: #2 Foundry Room Blast vented to baghouse B-3103

On April 26, 2007, the #2 Foundry Room Blast was observed in operation by Ohio EPA staff. Excessive fugitive emissions inside the building from other operations made assessing capture efficiency on this emissions unit impossible.

Actions:

No further actions necessary.

25. Findings: #2 Foundry general building fugitive emissions

On April 26, 2007, Ohio EPA staff witnessed a thick orange/brown cloud of fugitive emissions inside the building. Ohio EPA staff were unable to identify the emissions unit that generated the fugitives, however CSC staff explained that "this happens sometimes" when dirty metal is burned.

The fugitive emissions largely traveled to the north end of the building where it exited the building. The fugitives created a haze in the ambient air surrounding the north end of the building.

Violations:

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Actions:

Please identify the operations or activities generating these fugitive emissions, specify a comprehensive plan identifying how Columbus Steel Castings will achieve and maintain compliance with OAC rule 3745-17-08(B), and when the project will be completed.

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Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve compliance. In addition, include performance measures necessary to ensure that compliance will be maintained.

Please determine if these fugitive emissions originate from emissions units that are currently unpermitted. If necessary, submit a PTI application and include the emissions unit in the TV renewal application. Please include appropriate EAC forms for these emissions units along with any and all assumptions, calculations, citations and guidance utilized when completing any appropriate forms and information.

26. Findings: F002: Coupler Casting Finishing

On April 2, 2007, the Coupler Casting Finishing (F002) was observed in operation by Ohio EPA staff. No fugitive emissions were observed leaving the building at this time.

Actions:

No further actions necessary.

27. Findings: P032: Tumbleblast (B-3332, Pangborn, GN Barrel Blast Cleaning System) vented to baghouse B-3334

On April 2, 2007, April 10, 2007, and April 26, 2007 the Tumbleblast (P032) was observed in operation by Ohio EPA staff. Specific findings are as follows:

- On April 2, 2007, with the emissions unit in operation, baghouse B-3334 was emitting visible emissions. Prior to conducting Method 9 visible emission readings and documenting the pressure drop the emissions unit was shut down.
- On April 10, 2007, with the emissions unit in operation, baghouse B-3334 pressure drop was witnessed to be 3.0 inches of water.
- On April 10, 2007, with the emissions unit in operation, excessive emissions of fugitive dust were seen escaping into the building. In addition, as parts are removed onto a shaker table, fugitive emissions are generated and released into the building.

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- On April 26, 2007, with the emissions unit in operation, baghouse B-3334 pressure drop was observed as 3.2 inches of water.

The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of RACM, in accordance with the RACM report submitted on April 23, 1990. These measures shall include, but not be limited to, the following:

i. the use of an enclosure, in RACM area 34, around the tumbleblast to achieve a minimum 99% capture efficiency of potential emissions of fugitive dust; and

ii. all fugitive dust captured within the RACM area shall be vented to the baghouse B-3334.

By employing the above-mentioned RACM, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 34, including, but not limited to: doorways, windows and roof openings."

Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule.3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitutes a violation of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

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Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

28. Findings: P041: Air Arc Turntables (B-3658, B-3659, B-3656) vented to baghouse B-3656

On April 2, 2007, April 10, 2007, and April 26, 2007, the Air Arc Turntables (P041) were observed in operation by Ohio EPA staff. Specific findings are as follows:

- On April 2, 2007, with the turntables in operation, baghouse B-3656 pressure drop was witnessed to be 10.6 inches of water.
- On April 10, 2007, while two arc turntables were in operation, doors to the booths were open allowing most of the fugitive emissions to escape into the building.
- On April 10, 2007, with the turntables in operation, baghouse B-3656 pressure drop was witnessed to be 6.8 inches of water. Ohio EPA discovered kinked tubing. After correcting the kinked tubing, the pressure drop read 10.6 inches of water.
- On April 10, 2007, CSC staff explained that the emissions units work better with the doors open.
- On April 26, 2007, with the turntables in operation, baghouse B-3656 pressure drop was 3.7 inches of water.
- On April 26, 2007, only one of the original turntables was operating with minimal capture efficiency.
- On each of the site visits Ohio EPA staff witnessed a fourth operational air arc turntable. CSC staff explained that the fourth turntable is vented to the same baghouse, is not reflected in the applicable Title V permit and has not received a PTI.

The effective Title V permit states the following:

"The permittee shall eliminate visible emissions of fugitive dust through the employment of best available technology (BAT). These measures shall include, but not be limited to, the following:

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i. the use of an enclosure and hooding, in RACM area 34-4, around the air arc turntable to achieve a minimum 90% capture efficiency of potential emissions of fugitive dust;..."

and

"The pressure drop across baghouse B-3656 shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation."

In addition, the methods of minimizing emissions specified in the RACM area 34-2 and 34-4 analysis that Buckeye Steel Castings provided to Ohio EPA as a means of complying with OAC rule 3745-17-08(B) are not being followed. The applicable RACM study specified methodologies, equipment, capture equipment, capture efficiencies, control equipment, control efficiencies and work practices necessary to comply with OAC rule 3745-17-08(B). During the site visits CSC was not operating equipment in a manner that complies with OAC rule 3745-17-08(B).

Violations:

Not employing RACM in accordance with the existing Title V permit is considered a violation of ORC rule 3704.05(C).

Failure to properly capture and control fugitive particulate emissions constitutes a violation of OAC rule 3745-17-08(B).

Failure to comply with the terms and conditions of applicable installation and/or operating permits constitutes a violation of the August 30, 1996, Consent Order.

Failure to obtain an appropriate PTI prior to installation of a new source constitutes a violation of OAC rule 3745-31-02(A).

Failure to obtain an appropriate PTI prior to installation constitutes a violation of the August 30, 1996, Consent Order.

Actions:

Please submit a comprehensive plan specifying how CSC will achieve and maintain the required capture efficiencies and emissions limitations. Please

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include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed.

Also, submit an updated Preventive Maintenance and Malfunction Abatement Plan that addresses capture hooding, enclosures and equipment utilized to achieve the required capture efficiencies and fugitive particulate emissions limitations. In addition, include measures that CSC will implement to ensure that the required capture efficiency will be maintained.

In addition, please submit a PTI application and appropriate EAC form for the new emissions unit or to modify the existing PTI along with any and all assumptions, calculations, citations and guidance utilized when completing any of the above forms and information submitted.

29. Findings: Annealing Furnaces

Listed below are annealing furnaces observed during the site visits and listed in the Title V permit, their location, and applicable notes.

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Emissions Units:	Location:	Notes:
P042: B-3120 Heat Treat Furnace (non-insig)	Unknown	CSC staff is unaware of the location
P043: B-3847 Heat Treat Furnace (non-insig)	Unknown	CSC staff is unaware of the location
P044: B-3848 Heat Treat Furnace (non-insig)	Unknown	CSC staff is unaware of the location
P023: B-2464 No. 10 Annealing Furnace (non-insig)	Industrial Finishing	Number on emissions unit is B-2436 (not B-2464)
P016: B-2674 south holcroft oven (insig)	Coupler Building	None
P017: B-2027 north holcroft oven (insig)	Coupler Building	None
P020: B-1206 no. 6 annealing furnace (insig)	Industrial Finishing	None
P021: B-2575 no. 8 annealing furnace (insig)	Industrial Finishing	Number on emissions unit is B-2475 (not B-2575)
P022: B-2576 no. 9 annealing furnace (insig)	Industrial Finishing	None
P024: B-2760 no. 11 annealing furnace (insig)	Unknown	CSC staff is unaware of the location
Z001: B-2565 #7 annealing furnace (bolsters) (insig)	Industrial Finishing	None
Z005: B-1514 annealing furnace (insig)	Unknown	CSC staff is unaware of the location
????: No. 3 Annealing furnace (not listed in Title V)	Industrial Finishing	Observed but not included in Title V permit
????: No. 4 Annealing furnace (not listed in Title V)	Industrial Finishing	Observed but not included in Title V permit
????: No. 5 Annealing furnace (not listed in Title V)	Industrial Finishing	Observed but not included in Title V permit
????: West Annealing furnace, B-1507 (not listed in Title V)	Coupler Building	Observed but not included in Title V permit
????: East Annealing furnace (not listed in Title V)	Coupler Building	Observed but not included in Title V permit

The December 19, 2006, Notice of Violation letter requested a date by which specific information regarding the identification and location of emissions units in the Title V permit would be submitted. The February 27, 2007, letter from Calfee, Halter & Griswold LLP stated that CSC was fulfilling the request, however, no date was provided.

Since CSC staff is unable to provide accurate identification and/or location for many of these emissions units, Ohio EPA is unable to determine the compliance status of numerous annealing furnaces.

Actions:

Ohio EPA requests that CSC submit a site map identifying the location of each emissions unit, the respective company ID, company description, Ohio EPA ID (if

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it exists), Ohio EPA description from any applicable permit (if it exists) and the control equipment that controls each respective emissions unit.

If applicable, Ohio EPA requests that CSC submit appropriate PTI applications for emissions units that have been installed without obtaining a permit-to-install as specified in OAC rule 3745-31-02(A).

30. Findings: P907: Chromite/Silica Sand Separator vented to baghouse B-3657

CSC staff has repeatedly stated that the chromite/silica sand separator process is no longer used and will be shutdown and removed.

Actions:

Ohio EPA requests that CSC submit a shut down notification and request to revoke PTI 01-3005. In addition, please ensure that the most recent Title V renewal application does not include this emissions unit.

Compliance Plan and Schedule

Ohio EPA requests that Columbus Steel Castings submit a compliance plan and schedule within 60 days of receipt of this letter. The compliance plan and schedule should include the dates by which each respective "Action" will be submitted. In addition, Ohio EPA requests that an ITT be submitted within 60 days of receipt of this letter for each compliance demonstration requested as part of an "Action" specified above.

Please recognize that the above Findings and Violations were discovered as part of Columbus Steel Castings' Title V full compliance evaluation. This evaluation contains and consists, at a minimum, of an evaluation of each emissions unit listed in the applicable Title V permit. As the full compliance evaluation continues, additional site visits and records will be necessary to properly assess the full compliance status of Columbus Steel Castings.

Also, please note that the Ohio Environmental Protection Agency has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information submitted pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on

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whether or not to seek such penalties will be made by the Ohio Environmental Protection Agency at a later date.

If you have any questions, please contact Bryon Marusek at (614) 728-3803 or Adam Ward of my staff at (614) 728-3811.

Sincerely,


(for Isaac Robinson)

Isaac A. Robinson, III
Air Unit Manager
Division of Air Pollution Control
Central District Office

c: Bryon Marusek, DAPC/CDO
Adam Ward, DAPC/CDO
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John McGreevy, DAPC/CDO
Adam Novak, DAPC/CDO
John Kirwin, DAPC/CDO
Kelly Toth, DAPC/CDO
Mike Riggelman, DAPC/CDO
Craig Butler, Chief, CDO, w/attachments
Eric Yates, DAPC/CO, w/attachments
John Paulian, DAPC/CO, w/attachments
Jim Orlemann, DAPC/CO, w/attachments

06-01-07 CSC FCE letter/rw/bja

Attachments: December 19, 2006, letter to CSC
August 30, 1996, Consent Order