



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL # 7006 2760 0001 2070 6747

February 22, 2007

Mr. Thomas B. Whitten, Environmental Engineer
Columbus Steel Castings
2211 Parsons Avenue
Columbus, OH 43207

RE: Notice of Violation (NOV) resulting from the malfunction of the B-3700 Baghouse fan B and failure to respond to NOV's sent December 19, 2006, and October 17, 2006

Dear Mr. Whitten:

The Central District Office (CDO), Division of Air Pollution Control (DAPC), received a malfunction call from Columbus Steel Castings (CSC) on December 28, 2006, stating that the B-3700 Baghouse fan B was not operating. The B-3700 Baghouse serves P009 (Moldmaster Moldmaking and Sand Prep), P906 (Moldmaster Casting Processing System), P908 (Moldmaster Punchout/Shakeout Area) and various other emissions units.

Following the December 28, 2006, malfunction call, CDO received a call on January 3, 2007, stating that fan B was still not operating and that a written malfunction notice would be submitted. CDO received a written malfunction notice on January 5, 2007. On January 30, 2007, CDO received a call from CSC stating fan B had been repaired and a written malfunction report would be submitted. The written report was received by CDO on February 12, 2007, stating that the malfunction was repaired on January 30, 2007.

On February 9, 2007, CDO received a call from CSC stating that a bearing on B-3700 baghouse fan B had failed again after the repair on January 30, 2007.

Be advised, Ohio Administrative Code (OAC) Rule 3745-15-06(B) states:

"Malfunctions of air pollution control equipment shall be reported as follows:

(1) In the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law, the person responsible for such equipment shall

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

immediately notify the Ohio Environmental Protection Agency district office or delegate agency of such failure or breakdown. If the malfunction continues for more than seventy-two hours, the source owner or operator shall provide a written statement to the director within two weeks of the date the malfunction occurred. The immediate notification and written statement shall include the following data:

(a) Identification and location of such equipment including the Ohio environmental protection agency permit application number for each air contaminant source;

(b) The estimated or actual duration of breakdown;

(c) The nature and estimated quantity of air contaminants which have been or may be emitted into the ambient air during the breakdown period;

(d) Statements demonstrating that:

(i) Shutdown or reduction of source operation during the breakdown period will be or would have been impossible or impractical;

(ii) The estimated breakdown period will be or was reasonable in duration based on installation or repair time, delivery dates of equipment, replacement parts, or materials, or current unavailability of essential equipment, parts, or materials;

(iii) Available alternative operating procedures and interim control measures will be or have been implemented during the breakdown period to reduce adverse effects on public health or welfare; and

(iv) All actions necessary and required by any applicable preventive maintenance and malfunction abatement plan will be or have been implemented.

(2) The Ohio environmental protection agency district office or delegate agency shall be notified when the condition causing the failure or breakdown has been corrected and the equipment is again in operation. Notification of the correction of the condition causing the failure or breakdown may be given verbally if the duration of the malfunction is seventy-two hours or less. Otherwise, such notification shall be in writing.

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(3) Within two months following a failure or breakdown which exceeded seventy-two hours in duration, the owner or operator of such equipment shall prepare and submit a detailed report which identifies a program to prevent, detect and correct, as expeditiously as practicable, similar future failures or breakdowns of such equipment."

The verbal notifications and written documentation submitted by CSC to CDO do not meet the specifications of OAC Rule 3745-15-06(B), or Section I(B)(4) of the applicable Title V permit. Specifically, the written malfunction report received on February 12, 2007, did not include information specified in OAC rules 3745-15-06(B)(1)(a), 3745-15-06(B)(1)(c), 3745-15-06(B)(1)(d)(iv) and 3745-15-06(B)(3). In addition, the verbal notifications received did not include information specified in OAC rules 3745-15-06(B)(1)(a), 3745-15-06(B)(1)(c), and 3745-15-06(B)(2).

Be aware, pages 110-111 of the Preventive Maintenance and Malfunction Abatement Plan (PMMAP), provided by CSC on May 31, 1995, and approved by Ohio EPA on August 15, 1995, specifies a written malfunction report form. None of the above malfunction reports were submitted using this form. Use of the PMMAP is specified in OAC rule 3745-15-06(D) and Part III.A.1.2 of the terms and conditions of each emissions unit in the applicable Title V permit.

Not satisfying the above reporting obligations are considered violations of OAC rule 3745-15-06(B), OAC rule 3745-15-06(D) and Ohio Revised Code (ORC) 3704.05(C) for violating the existing Title V permit issued December 30, 2002.

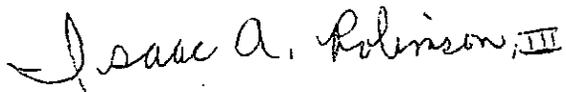
Be aware, the NOV letter sent December 19, 2006, received by CSC on December 21, 2007, requested a Compliance Plan and Schedule identifying how specific violations would be addressed. The NOV provided 60 days (until February 19, 2007) from receipt for the Compliance Plan and Schedule. As of February 21, 2007, no response has been received. In addition, CDO still has not received a response to the NOV, sent on October 17, 2006. This NOV was a result of complaint investigations and requested a response within 30 days.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

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Please submit malfunction information for the above malfunctions in accordance with OAC rule 3745-05-06(B) and OAC rule 3745-15-06(D) within fourteen (14) days of receipt of this letter. If you have any questions concerning the issues addressed in this letter, you may contact Bryon Marusek at (614) 728-3803.

Sincerely,



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

c: Bryon Marusek, Ohio EPA, DAPC/CDO
Adam Ward, Ohio EPA, DAPC/CDO
Kelly Toth, Ohio EPA, DAPC/CDO
Craig Butler, Ohio EPA, DAPC/CDO
Eric Yates, Ohio EPA, DAPC/CO
John Paulian, Ohio EPA, DAPC/CO