



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

February 27, 2013

RE: ELYRIA FOUNDRY CO.  
PERMIT NO. 3MP00001\*AM  
LORAIN COUNTY

Elyria Foundry Company  
Mr. Earl Marcum  
Safety Manager  
120 Filbert Street  
Elyria, Ohio 44036

Dear Mr. Marcum:

On February 20, 2013, a site visit of the above referenced facility was conducted by this writer. The facility was represented by you. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above referenced Management Plan for Spent Foundry Sand.

During the inspection, the following items were noted/ discussed:

1. You have been employed by Elyria Foundry since October 2010.
2. The Statewide Management Plan for Spent Foundry Sand was issued to Elyria Foundry on December 24, 2008 with an effective date of February 1, 2009.
3. The spent foundry sand is transported to Barnes Nursery, LLC on a daily basis.
4. You indicated that 30 million pounds of spent foundry sand was hauled to Barnes Nursery in 2011.
5. An additional 36 million pounds of spent foundry sand was hauled to Barnes Nursery in 2012.
6. You are responsible for annually collecting a representative composite sample of the spent foundry sand that is intended to be beneficially used.
7. Precision Analytical performs the analysis on the spent foundry sand.
8. The files were reviewed to determine if Elyria Foundry is maintaining the appropriate records as required by the above referenced Management Plan. It appears that all of the requirements of the Management Plan are being met.
9. You are responsible for inputting the analytical results into Ohio EPA's electronic discharge monitoring report. Mr. James Lawrence, Vice President, pins and submits the data
10. You indicated that you would like to be able to submit the electronic discharge monitoring report. In order for you to submit the report, you have to become a delegated submitter. Please review page 6 of the following document: <http://www.epa.state.oh.us/portals/35/edmr/doc/e-DMRAI-In-One.pdf> It provides information pertaining to a delegated submitter. Please feel free to contact Mr. Jamie Roberts from our Central Office at [James.Roberts@epa.ohio.gov](mailto:James.Roberts@epa.ohio.gov) or (614) 644-2054 to assist you on this matter.

This office has recently reviewed your self-monitoring reports covering the period February 1, 2009 through January 31, 2013 for the referenced facility. Our review indicates violations of the terms and conditions of your Management Plan for Spent Foundry Sand. The specific instances of noncompliance are as follows

**Limit Violations**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
401	01170	Iron, Total In Sludge	1D Conc	23000	37200.	6/15/2012

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of surface Water

MWS/cs