

Mr. Kimberly Neff
Columbus Castings
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During the previous period of Title V compliance, Buckeye Steel Castings, during its operating period, has and continues to have Title V violations.

1. Buckeye Steel Castings, in Part 1, has violated Title V PTO, which was issued to it by the Ohio Center for Energy, as follows by Part 1 PTO:

"The permit conditions require that Buckeye Steel Castings install and operate a dust control system that is capable of capturing at least 98% of the dust emissions from the facility. The permit conditions also require that Buckeye Steel Castings install and operate a dust control system that is capable of capturing at least 98% of the dust emissions from the facility."

i. Buckeye Steel Castings, in RACM, has not provided for a dust control system for the facility that is capable of capturing at least 98% of the dust emissions from the facility.

iv. all fugitive dust capture devices in the RACM area shall be verified to be baghouses P-3700, B-3635 and B-3640.

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

Buckeye Steel Castings entered into a Consent Order by the Court of Common Pleas, Franklin County, Ohio, on August 30, 1999, which included 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 Injunctions to Install and Permits to Operate which are issued to it for air pollutant sources at the Facility."

Columbus Castings entered into a Consent Order by the Court of Common Pleas, Franklin County, Ohio, on April 22, 2009, which stated the following Paragraph 24:

"Defendant shall perform all casting and scrap breakout, shakeout, and sand handling activities using emissions units that have approved permits for such activities and in accordance with the Title V permit terms and conditions or approved PTI."

Findings:

Not achieving specified capture efficiency as specified in PTI 01-08278 and the existing Title V permit are considered violations of Ohio Revised Code (ORC) 3704.05(C) which states that

PERMIT TO INSTALL

Ohio Administrative Code (OAC) rule 3745-31-02(A) requires that a permit-to-install be obtained prior to the installation of a new source or major modification of an existing source. OAC rule 3745-31-02(A) states that "no person shall cause, permit, or allow the installation or modification of a new source or major modification of an existing source without first obtaining a permit to install from the director."

On April 22, 2009, Columbus Castings was issued a Consent Order by the Court of Common Pleas, Franklin County, Ohio which stated the following in Paragraph 24: "Defendant shall perform all routine and scrap breakout, shakeout, and sand handling activities using only units that have approved permits for such activities and in accordance with the Title V permit terms and conditions or approved PTI."

On June 1, 2007, and March 30, 2010, (enforced) Ohio EPA issued Notices of Violation (NOV) citing Columbus Castings for the installation and operation of the most End Breakout Area, and at that time requested that the facility submit permit calculations and permit applications. To date, neither accurate calculations nor a F.I.I application have been received.

On April 22, 2009, Columbus Castings was issued a Consent Order by the Court of Common Pleas, Franklin County, Ohio which stated the following in Paragraph 24:

"Defendant shall perform all routine and scrap breakout, shakeout, and sand handling activities using only units that have approved permits for such activities and in accordance with the Title V permit terms and conditions or approved PTI."

PERMIT TO INSTALL

Failure to obtain a permit-to-install prior to installation of a new source is considered a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A), which states that

"...no person shall cause, permit, or allow the installation or modification of a new source ...without first obtaining a permit to install from the director." Violations of OAC rule 3745-31-02 are also considered violations of ORC 3704.05(A), which states that "No person shall cause, permit, or allow emission of an air contaminant in violation of any rule adopted by the director of environmental protection..."

Failure to obtain a permit-to-install prior to the installation of a major modification is considered a violation of OAC rule 3745-31-21(A), which states:

"No owner or operator of a major stationary source or major modification located in a nonattainment area shall begin actual construction of such major stationary source or major modification unless, as a minimum, the requirements in rules 3745-31-21 to 3745-31-27 of the Administrative Code have been met and the owner or operator of the stationary source

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be completed in accordance with the requirements of Part 3745-114-01, OAC, and the requirements of the Ohio Air Quality Criteria for particulate matter.

The following information is required for the modeling of fugitive emissions from unpermitted breakout areas: (1) a list of all emissions units and physical operations associated with the breakout areas; (2) a list of all pollutants emitted from each emissions unit and physical operation; (3) a list of all control measures used to control fugitive emissions from each emissions unit and physical operation; and (4) a list of all RACM measures used to control fugitive particulate emissions from each emissions unit and physical operation.

REQUIRED ANALYSIS

The following analysis is required for the modeling of fugitive emissions from unpermitted breakout areas: (1) a list of all emissions units and physical operations associated with the breakout areas; (2) a list of all pollutants emitted from each emissions unit and physical operation; (3) a list of all control measures used to control fugitive emissions from each emissions unit and physical operation; and (4) a list of all RACM measures used to control fugitive particulate emissions from each emissions unit and physical operation.

1. Hourly and annual potential to emit (PTE) calculations for all emissions units and physical operations associated with the breakout areas. The hourly and annual potential to emit are to be calculated and performed for volatile organic compounds (VOC), individual hazardous air pollutants (HAPs), particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM10), and particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM2.5).
2. Maximum hourly PTE calculations for toxic air contaminants, as defined in OAC rule 3745-114-01, for all emissions units and physical operations associated with the breakout areas, along with the distance of each emissions unit and physical operation to the nearest fence line. The maximum hourly emissions rate for both the toxic air contaminants with the highest emissions rates and those with the lowest TWA or STEL should be modeled in accordance with Ohio EPA Engineering Guides 69 and 70 to demonstrate that emissions of toxic air contaminants do not pose a risk to public health and safety.
3. A description and analysis of RACM utilized to control fugitive particulate emissions from each emissions unit and physical operations in the breakout areas. If RACM is/are not currently employed in these unpermitted breakout areas, please submit an engineering study that determines the cost effectiveness of the installation of control measures pursuant to Ohio Engineering Guide #46 (enclosed).
4. If the potential emissions from unpermitted breakout area emissions units and physical operations exceed Prevention of Significant Deterioration thresholds for any attainment area criteria pollutant, include an evaluation including appropriate modeling and Best Available Control Technology (BACT) analysis. If the potential emissions from any of the breakout area emissions units and physical operations exceed Non-Attainment New Source Review thresholds, then include an evaluation including appropriate modeling and

5. A copy of the final compliance plan (LAP) must be submitted for this permit within 30 days.
6. Any additional testing, monitoring, or data collection required by the permit must be completed in accordance with the above conditions and within the time period specified in the permit. The permittee must submit a report to the permittee's permit administrator within 30 days of the completion of the testing, monitoring, or data collection. The report must include a description of the testing, monitoring, or data collection, the results of the testing, monitoring, or data collection, and a comparison of the results to the permit conditions. The report must also include a copy of the permit conditions that apply to the testing, monitoring, or data collection.
6. Ohio EPA recommends that CC review the April 20, 2012, Consent Order requirements.

Within thirty (30) days, submit a compliance plan specifying how CC will achieve and maintain the compliance with OAC rule 3745-17-08 and any other applicable rules. Please include a description of how compliance will be demonstrated, what specific physical improvements will be made, and when the project will be completed. This information may be included in the engineering study pursuant to Ohio Engineering Guide #46 as requested above.

3. Permittees:
 - Annealing Furnaces in Industrial finish (Department 39)
 - P020 – B-1206 (No. 6 Annealing Furnace)
 - P021 – B2575 (No. 8 Annealing Furnace)
 - P022 – B-2576 (No. 9 Annealing Furnace)
 - P023 – B-2464 (No. 10 Annealing Furnace) installed 1966
 - P043 – B-3847 (No. 3 Heat Treat Furnace) installed 1998
 - P044 – B-3848 (No. 4 Heat Treat Furnace) installed 1998
 - P061 – B-3849 (No. 5 Annealing Furnace) (also referred to as P024)
 - Z001—B-2565 (No.7 Annealing Furnace)

Observations

During the April 19, 2012, and May 1, 2012, site visits, CDO personnel observed these annealing furnaces and noted that they were in different stages of operating, including start up and shutdown with temperature setpoints of 1900 degrees Fahrenheit. The permittee uses only natural gas as fuel in these emissions units. Ohio EPA did not observe the presence of any burner nozzle tips. The PTI applications utilized an emission factor valid at 1700 degrees Fahrenheit the increase in operating temperature represents a change in operation that from what was requested in the PTI application.

Mrs. Kimberly L. ...
Columbus, Ohio 43260
Phone: (614) 233-1234

4. **Permit-to-Install (PTI) for the Industrial Finishing Area**

CDO# 1234567

CDO needs additional information and cannot determine compliance with applicable regulations at this time. Please provide the following information within sixty (60) days of receipt of this letter:

Background Information:

For installations or modifications occurring prior to 2001, Ohio EPA uses the "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy"). For installations or modifications occurring in 2001 or later, Ohio Revised Code (ORC) 3704.03(F)(3) and ORC 3704.03(F)(4) require the evaluation of air toxic emissions.

Please note, the facility may be subject to a federal area source "Reasonably Available Control Technology (GACT)" rule. At this time Ohio EPA does not enforce compliance with GACT rules; however the facility is required to meet the requirements of these rules if applicable.

Violations:

Failure to obtain a permit-to-install prior to the modification of a source is considered a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A), which states that

"...no person shall cause, permit, or allow the installation or modification of a new source ...without first obtaining a permit to install from the director." Violations of OAC rule 3745-31-02 are also considered violations of Ohio Revised Code (ORC) 3704.05(A), which states that "No person shall cause, permit, or allow emission of an air contaminant in violation of any rule adopted by the director of environmental protection..."

Recommended Action:

CDO needs additional information and cannot determine compliance with applicable regulations at this time. Please provide the following information within sixty (60) days of receipt of this letter:

1. Hourly and annual potential to emit (PTE) calculations for all emissions units and physical operations associated with the Industrial Finishing area. The hourly and annual potential to emit analyses should be performed for volatile organic compounds (VOC), individual and combined Hazardous Air Pollutants (HAPs),

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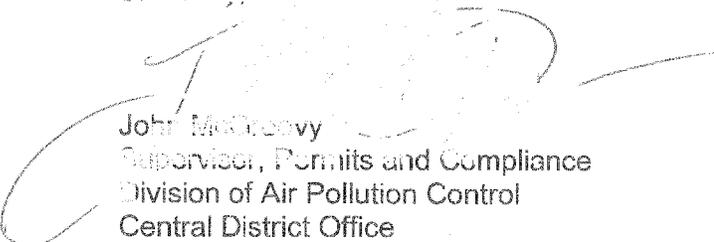
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which are...

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If you have any questions, please contact Barbara Walker at (614) 720-3905 or
Barbara.Walker@epa.gov.

Si...



John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

Enclosures: December 19, 2006, NOV
June 1, 2007, NOV
March 30, 2010, NOV
Engineering Guide...

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