



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED MAIL # 91 7108 2133 3932 1838 3205

June 8, 2012

Mrs. Kimberly Ness
Columbus Castings
2211 Parsons Avenue
Columbus, OH 43207-2386

Re: NOTICE OF VIOLATION
Facility ID: 0125040020
Name: Columbus Castings
Location: 2211 Parsons Avenue
Columbus, OH 43207-2386
Franklin County

Dear Mrs. Ness:

The Ohio Environmental Protection Agency (Ohio EPA), Division of Air Pollution Control (DAPC), Central District Office (CDO), has completed a portion of the full compliance evaluation of Columbus Castings (CC), located at 2211 Parsons Avenue, Columbus, Ohio. Columbus Castings is the current name of the facility identified by DAPC as 0125040020. This facility was previously known as Columbus Steel Castings and Buckeye Steel Castings. Full compliance evaluations of your Title V facility are conducted on a tri-annual basis, consistent with federal policy. The purpose of this facility compliance evaluation is to document a facility's compliance status with the effective Title V permit to operate, applicable Permits to Install (PTIs), the approved Preventive Maintenance and Malfunction Abatement Plan (PMMAP), and applicable state and federal rules and regulations. A full compliance evaluation consists of an evaluation of Title V significant emissions units, many known physical operations and many insignificant emissions units via an on-site inspection and review of applicable facility records (current and historical), correspondence, and notifications.

This letter summarizes Ohio EPA's finding as a result of a partial records review on May 18, 2012 in conjunction with the on-site inspection during site visit May 1, 2012. Additional inspections for the full compliance evaluation will be on-going and documented in future correspondence.

Listed below are "Findings" based upon Ohio EPA inspector observations, specific process information, and/or observed operations of various emissions units installed at the facility (if possible). The "Finding(s)" below includes observations and regulatory background, and are followed by "Violation(s)" (where applicable) and "Requested Action(s)" considered necessary to resolve any stated violations. A summary of requested actions and dates necessary to address any observed violations concludes the letter.

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

1. **Finding:** P905 collection system in accordance with the PMMAP

Observations

During the site visit on May 1, 2012, CDO staff witnessed and documented holes in the collection system connecting the dust collection points to the associated control equipment (see enclosed pictures). During the site visit on May 18, 2012 CDO staff collected copies of PMMAP forms 33 and 34 for the April inspections. PMMAP Form 33 dated April 6, 2012, for the "B-3306, EAST COLLECTOR EAST SAND SYSTEM" indicated the "DUCT FROM COLLECTION POINTS TO FAN EXHAUST" was "OK". PMMAP Form 34 dated April 24, 2012, for the "B-3552, WEST COLLECTOR EAST SAND SYSTEM" indicated the "DUCT FROM COLLECTION POINTS TO FAN EXHAUST" was "OK".

Regulatory Information

The effective Title V Permit to Operate (TV PTO) states the following for P905 East End Sand System in section A.I.2.c:

"The permittee shall maintain this emissions unit and associated air pollution control equipment in accordance with the Preventative Maintenance and Malfunction Abatement Plan (PM&MAP) as approved on August 15, 1995, in accordance with OAC rule 3745-15-06(D)..."

Violations

Failure to accurately complete PMMAP operation and maintenance records is considered a violation of OAC rule 3745-15-06(D)(3) which states:

"Operation and maintenance records shall be maintained by the owner or operator of the source to demonstrate that any preventive maintenance and malfunction abatement plan is fully implemented."

Failure to comply with the existing Title V permit is considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

"No person who is the holder of a permit ... shall violate any of its terms or conditions."

Requested Action

Within fifteen (15) days of receipt of this letter, please submit a comprehensive plan specifying how CC will comply with the requirements of the approved

Mrs. Kimberly Ness
Columbus Castings
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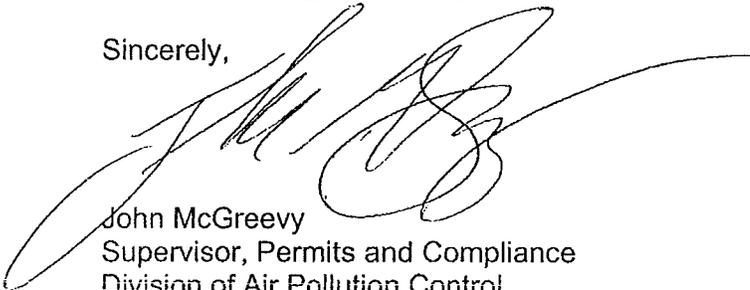
PMMAP. If required, please specify specific training measures that will be implemented.

Additional Information

Please note that the Ohio EPA has the authority to seek civil penalties as provided in ORC 3704.06. This letter or information 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 whether or not to seek such penalties will be made by the Ohio EPA at a later date.

If you have any questions, please contact Barbara Walker of my staff at (614) 728-3805 or Barbara.walker@epa.ohio.gov.

Sincerely,



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

Enc. CC PMMAP Form 33, April 6, 2012
CC PMMAP Form 34, April 24, 2012
Four (4) pictures taken by CDO May 1, 2012

c: William MacDowell, Region 5 U.S. EPA
Adam Ward, Assistant Chief, CDO

e: John McGreevy, DAPC/CDO
Kelly Toth, DAPC/CDO
Bryon Marusek, DAPC/CDO
Barbara Walker, DAPC/CDO
Tom Kalman, DAPC/CO
Bruce Weinberg, DAPC/CO
John Paulian, DAPC/CO

BUCKEYE STEEL CASTINGS CO.

MONTHLY INSPECTION, LUBRICATION, AND MAINTENANCE SHEET FOR
 E-3306, EAST COLLECTOR
 EAST SAND SYSTEM

		CHECK IF OK	DESCRIBE PROBLEM
1	DAILY INSP. SHEET REVIEW	✓	
2	EXHAUSTER BEARINGS	✓	
3	ROTARY VALVES, GATES OR DAMPERS	✓	
4	"V" BELTS AND SHEAVES	✓	
5	HANGERS, BAGS, CASES & VENTURIS	✓	
6	DUCT FROM COLLECTION POINTS TO FAN EXHAUST	✓	
7	FAN VIBRATION	✓	
8	MOTORS, COUPLINGS AND DISCONNECTS	✓	
9	INSPECT HOUSE AND WORMS FOR LEAKS AND LOSSES	✓	

INSPECTOR Tyrone Taylor
 DATE 4-6-12

ADDITIONAL COMMENTS:



BUCKEYE STEEL CASTINGS CO.

MONTHLY INSPECTION, LUBRICATION, AND MAINTENANCE SHEET FOR

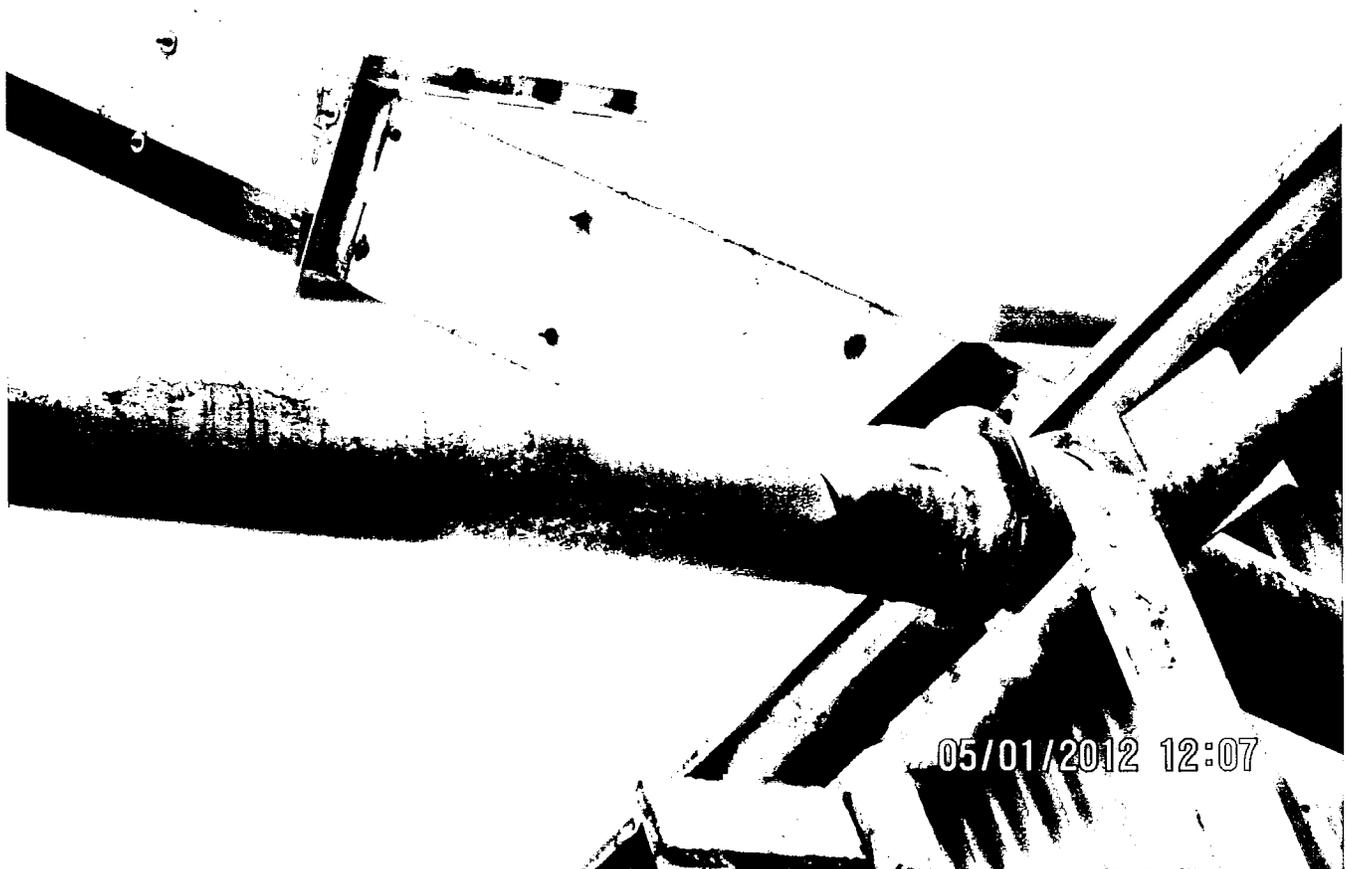
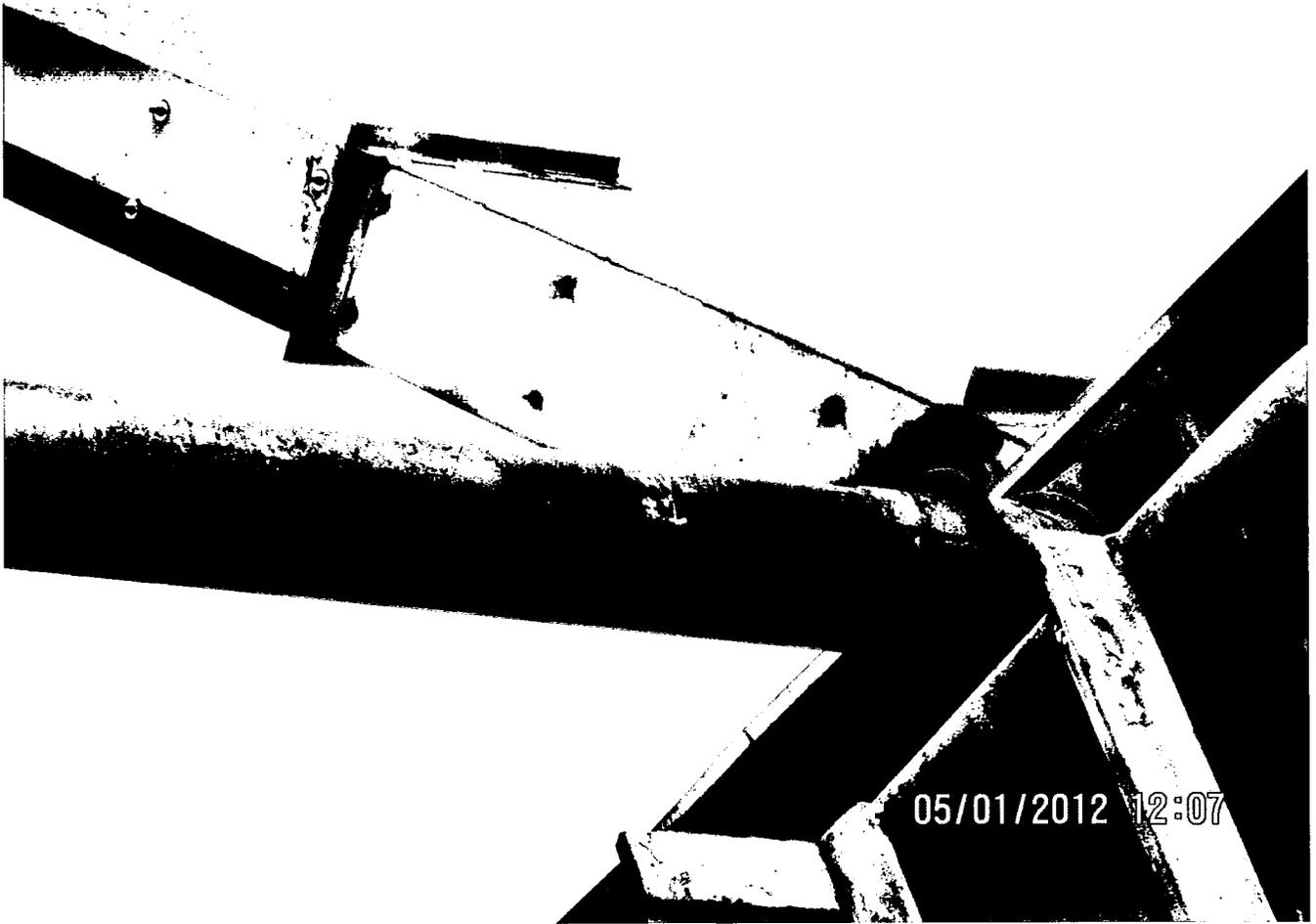
8-3502, WEST COLLECTOR
EAST END SAND SYSTEM

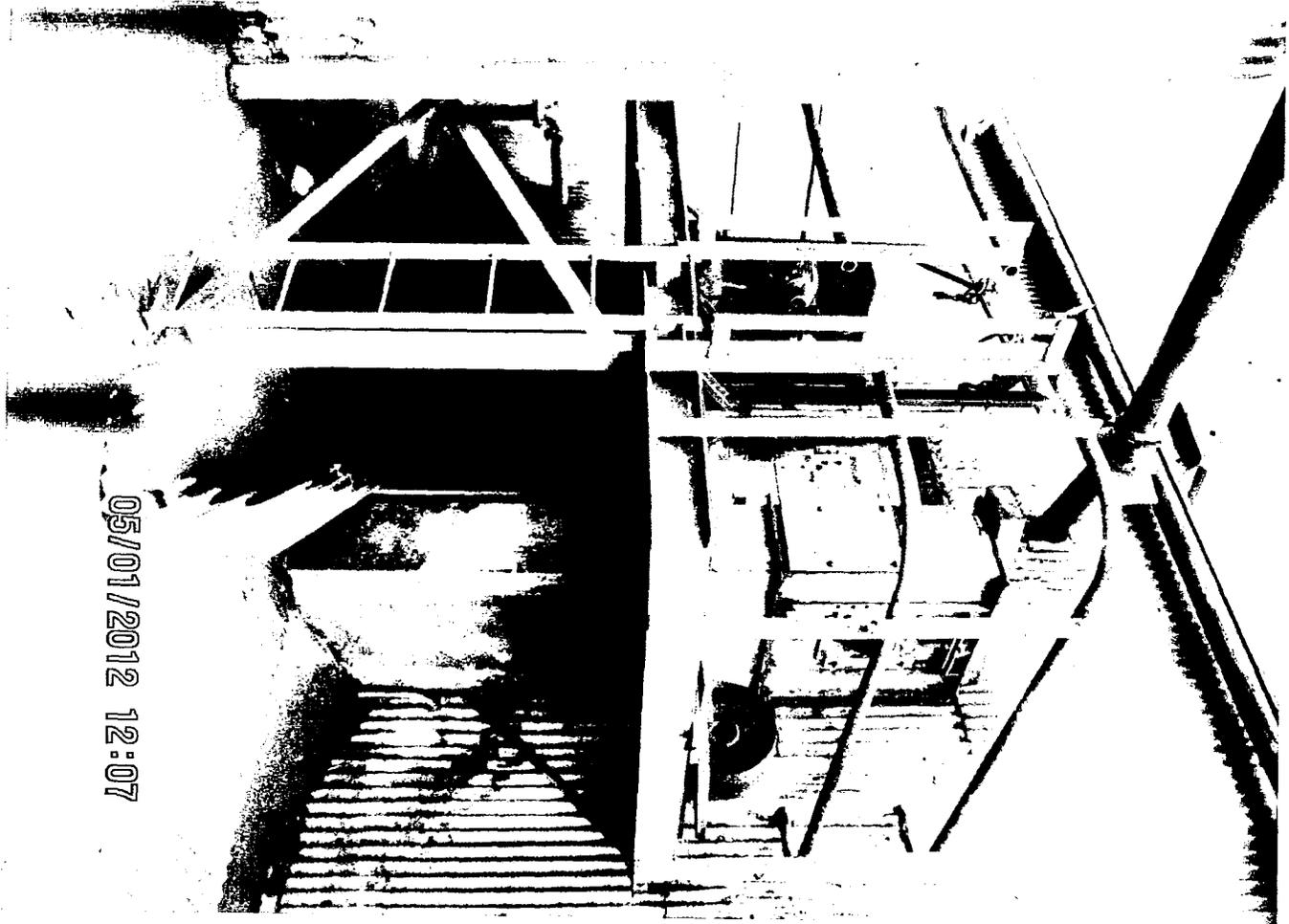
	CHECK IF OK	DESCRIBE PROBLEM
1 DAILY INSP. SHEET REVIEW	✓	
2 EXHAUSTER BEARINGS	✓	
3 ROTARY VALVES, GATES OR DAMPERS	✓	
4 VV BELTS AND SHEAVES	✓	
5 HANGERS, BAGS, CAGES & VENTURIS	✓	
6 DIRT FROM COLLECTION PENCIL TO FAN EXHAUST	✓	
7 MAX VIBRATION	✓	
8 MOTORS, COUPLINGS AND DISCONNECTS	✓	
9 INSPECT HOUSE AND HOSES FOR LEAKS AND LOSSES	✓	

INSPECTOR Tyrone Taylor

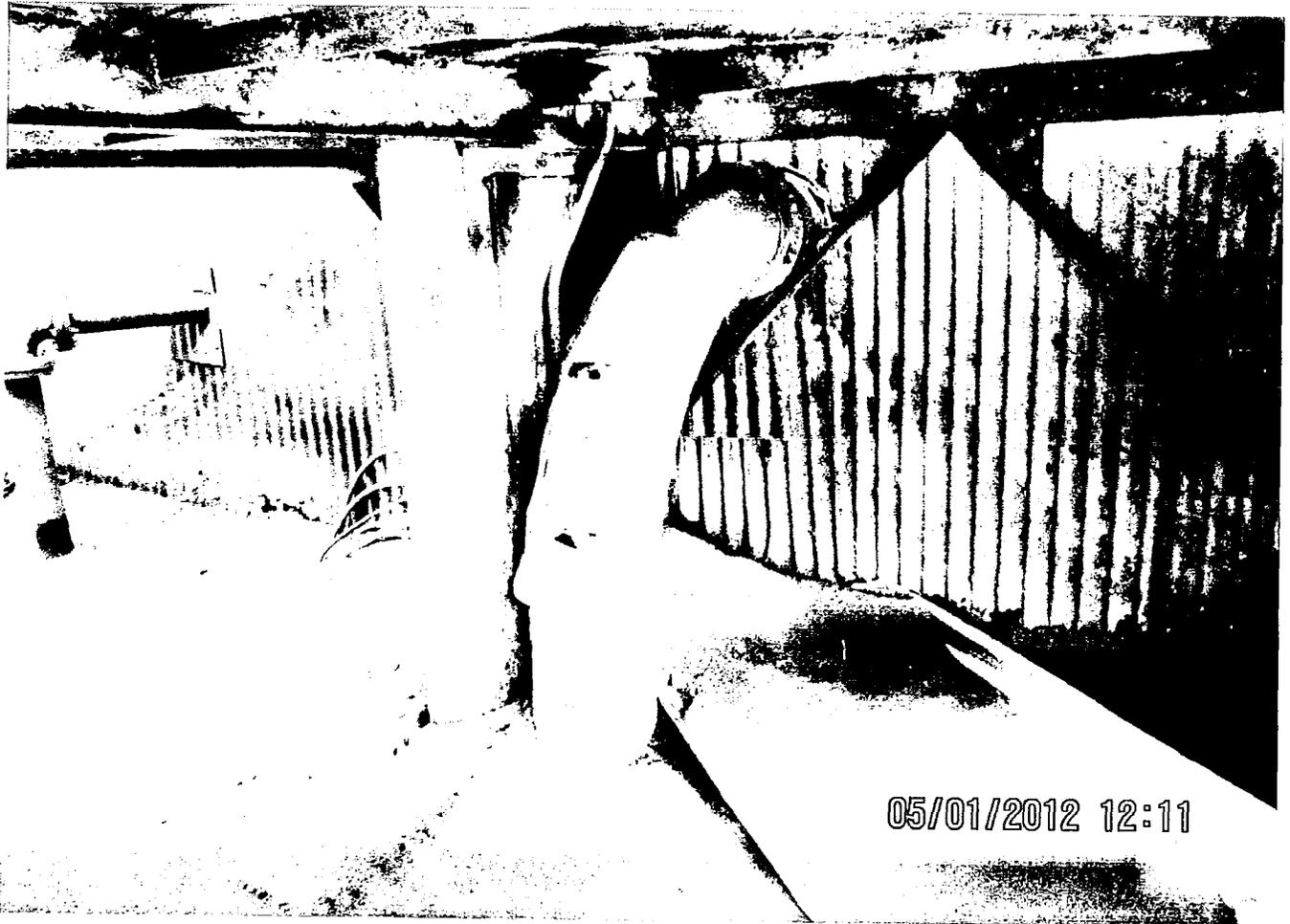
DATE 4-24-12

ADDITIONAL COMMENTS:





05/01/2012 12:07



05/01/2012 12:11