



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

February 25, 2009

RE: NOTICE OF VIOLATION
HIGH PRIORITY FACILITY
0278000025
CERTIFIED MAIL

Mr. William Mozes
Ellwood Engineered Castings Co.
7158 Hubbard Masury Road
Hubbard, OH 44425

Dear Mr. Mozes:

On February 17, 2009, Mr. James Jones and yourself, representing Ellwood Engineered Castings (EEC), and your consultants Mr. Dennis Ritter and Mr. Mick Pompella, representing URS Corp., met at our office to discuss your Title V renewal permit. We discussed that EEC is a major source with respect to the MACT standards, specifically Subpart EEEEE for iron and steel foundries. Although EEC completed a study showing they were not an actual major source of hazardous air pollutants (HAPs), to avoid the MACT, EEC would have had to obtain a federally enforceable state operating permit (FESOP) by April 23, 2007, the effective date for compliance with the MACT. EEC was late in submitting its FESOP application and it had to be returned.

It was brought up that EEC is currently not in compliance with the MACT and we discussed possible orders to allow EEC to meet compliance.

Ohio EPA can pursue administrative orders through our enforcement division to give EEC a schedule to meet compliance.

Currently, EEC has proposed plans for a new canopy collection system in the melt shop that will be connected to a new baghouse. This should bring the melt shop into compliance with the opacity and capture requirements of the MACT standard.

Please provide us with an installation schedule for this project (award contracts, initiate on-site construction, completed on-site construction, and achieve compliance). The February 17, 2009, letter does describe the project, but if any more details or information is available, please include it. The schedule should be submitted within one week of receipt of this letter.

If you have any questions, please feel free to contact me at (330) 963-1243.

Sincerely,

Robert Goulish
Environmental Engineer
Division of Air Pollution Control

RG:bo

pc: Mr. Jamie Jones, EEC Facility Engineer
Tim Fischer, OEPA, NEDO, DAPC
Tom Kalman, OEPA, CO, DAPC
Lisa Holscher, USEPA, Region V