



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

April 3, 2008

RE: NOTICE OF VIOLATION
DAPC FACILITY ID: 02-47-00-0014

CERTIFIED MAIL

Mr. Samuel Knezevic, Chief Operating Officer
Elyria Foundry
120 Filbert Street
Elyria, OH 44036

Dear Mr. Knezevic:

The purpose of this letter is to inform you that Elyria Foundry has violated several air pollution control rules and regulations and the terms and conditions of its permits. Elyria Foundry has been notified of some of these violations in a letter dated October 18, 2007 and others in a letter dated November 21, 2007. Since the date of these letters, this office has determined that other violations have occurred. The remainder of this letter serves to notify Elyria Foundry of each violation and to describe each violation in detail.

Installation of K003:

During an inspection of the facility on September 26, 2007, this office discovered that in February of 2006, Elyria Foundry installed and began operating K003 "West Cleaning Room Paint Booth," in violation of Ohio Administrative Code rule 3745-31-02 (Permits-to-Install). This is also a violation of Ohio Revised Code (ORC) Section 3704.05(G).

In a letter dated October 18, 2007, a representative of this office requested that Elyria Foundry either submit permit applications or a justification as to why permit applications were not required for the booth. On November 13, 2007, this office received a permit-to-install (PTI) application for the spray booth from Elyria Foundry. Subsequently, a PTI was issued to Elyria Foundry for K003 on December 11, 2007.

Exceedence of annual production restriction for F002:

According to Elyria Foundry's records, F002 exceeded it's rolling, 12-month production restriction of 11,000 TPY on three occasions. Specifically, the rolling, 12-month production summations for April '07, June '07, and July '07 were 11,006 tons, 11,151 tons, and 11,149 tons, respectively. These are violations of the terms and conditions of PTI 02-12455 and of Elyria Foundry's Title V permit. Violations of the terms and conditions of any permit issued by Ohio EPA are also violations of ORC Section 3704.05(C).

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These exceedences of the production restriction correlate to 8.25+, 8.36, and 8.36 tons per year of emissions in violation of the 8.25 tons per year emission limitation specified in PTI 02-12455 and Elyria Foundry's Title V permit. Violations of any emission limitation established by Ohio EPA are also violations of ORC Section 3704.05(A) and violations of the terms and conditions of any permit issued by Ohio EPA are also violations of ORC Section 3704.05(C).

Exceedence of hourly production restriction for F010:

As a monthly average, the hourly production for F010 exceeded the restriction of 5.25 tons per hour specified in PTI 02-8154 and Elyria Foundry's Title V permit during six calendar months as follows:

May '05	5.30 tons/hr
April '07	5.57 tons/hr
May '07	5.97 tons/hr
June '07	5.44 tons/hr
July '07	5.69 tons/hr
September '07	5.70 tons/hr

These are violations of the terms and conditions of PTI 02-8154 and Elyria Foundry's Title V permit. Violations of the terms and conditions of any permit issued by Ohio EPA are also violations of ORC Section 3704.05(C).

Failure to perform visible emission checks for P030:

From January 1, 2007 through November 5, 2007, Elyria Foundry failed to perform visible emission checks for P030, in violation of PTI 02-22407. A violation of the terms and conditions of any permit issued by Ohio EPA is also a violation of ORC Section 3704.05(C).

In a letter dated November 5, 2007, Elyria Foundry indicated that checks were not performed because it did not believe it was necessary to perform visible emissions checks because the unit was inside of a building. At that time, visible emissions checks were initiated.

Baghouse pressure drop deviations:

The following table details the pressure drop deviations recorded by Elyria Foundry since January 3, 2005, for each baghouse:

Baghouse	Emissions Unit(s) Served	Range	Number of Deviations	Deviations Occurred Between
Baghouse #2 (CL0069)	P004/P006	4" to 8.5"	110 days	01/03/05 to 12/21/07
Baghouse #3 & #4 (CL0010)	P008	4" to 8.5"	128 days	01/03/05 to 12/21/07
Baghouse #7 (CL0083)	F009/P005	4" to 8.5"	84 days	01/03/05 to 12/21/07
Baghouse #6 (CL0035)	P007	2" to 6"	402 days	01/03/05 to 12/21/07
Baghouse #8 (10F028)	P023	4" to 8.5"	669 days	01/03/05 to 12/21/07
Baghouse #9 (11F071)	F011	4" to 8.5"	644 days	01/03/05 to 12/21/07
Baghouse #10 (11F072)	F011	4" to 8.5"	246 days	01/03/05 to 12/21/07
Baghouse #11 (11F002)	F010	4" to 8"	56 days	01/03/05 to 12/21/07
Baghouse #13 (SD0080)	P027/P016	4" to 8.5"	742 days	01/03/05 to 12/21/07
Baghouse #15 (30F034)	F007/P024	4" to 8.5"	627 days	01/03/05 to 12/21/07
Baghouse #17 (MS0017)	P017/P026	4" to 10"	604 days	01/03/05 to 12/21/07

Each recorded pressure drop outside the allowable range is a violation of the terms and conditions of Elyria Foundry's Title V permit. A violation of the terms and conditions of any permit issued by Ohio EPA is also a violation of ORC Section 3704.05(C).

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Failure to submit reports, failure to submit reports on time, and failure to submit accurate reports:

The following quarterly reports were submitted late in violation of the terms and conditions of Elyria Foundry's Title V permit:

<u>Report</u>	<u>Date Due</u>	<u>Date Received</u>
2 nd quarter '05	07/31/05	10/20/05
4 th quarter '05	01/31/06	08/25/06
1 st quarter '06	04/30/06	08/25/06
2 nd quarter '06	07/31/06	08/25/06
3 rd quarter '06	10/31/06	03/05/07
4 th quarter '06	01/31/07	03/05/07

The following semiannual reports were submitted late on the respective dates:

<u>Report</u>	<u>Date Due</u>	<u>Date Received</u>
1 st half '05	07/31/05	10/20/05
2 nd half '05	01/31/06	08/25/06
1 st half '06	07/31/06	08/25/06
2 nd half '06	01/31/07	03/05/07

The following quarterly reports were not submitted:

<u>Report</u>	<u>Date Due</u>
1 st quarter '07	04/30/07
2 nd quarter '07	07/31/07
3 rd quarter '07	10/31/07
4 th quarter '07	01/31/08

The following semiannual reports were not submitted:

<u>Report</u>	<u>Date Due</u>
1 st half '07	07/31/07
2 nd half '07	01/31/08

Submittal of inaccurate reports:

All eight quarterly reports and both annual compliance certifications for 2005 and 2006 were submitted indicating that no or few deviations occurred. However, Elyria Foundry's records demonstrated that numerous deviations occurred, as outlined above. This is a violation of the terms and conditions of Elyria Foundry's Title V permit, specifically Part I, Section A.12.a., which reads as follows:

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Submittal of inaccurate reports:

All eight quarterly reports and both annual compliance certifications for 2005 and 2006 were submitted indicating that no or few deviations occurred. However, Elyria Foundry's records demonstrated that numerous deviations occurred, as outlined above. This is a violation of the terms and conditions of Elyria Foundry's Title V permit, specifically Part I, Section A.12.a., which reads as follows:

Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

Because the deviations are recorded in Elyria Foundry's record keeping, reasonable inquiry into the compliance status did not occur before the reports were certified by the Responsible Official. This violation of the terms and conditions of the Title V permit is also a violation of ORC Section 3704.05(C).

If you have any questions, please contact me at (330) 963-1270.

Respectfully,



Erik M. Bewley
Environmental Specialist
Division of Air Pollution Control

EB:bo

ec: Dennis Bush, Ohio EPA, DAPC, NEDO
Ed Fasko, Ohio EPA, DAPC, NEDO
Bob Princic, Ohio EPA, DAPC, NEDO
Tom Kalman, Ohio EPA, DAPC, CO
Lisa Holscher, USEPA, Region V