



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 3, 2009

RE: NOTICE OF VIOLATION
DAPC FACILITY ID: 02-47-00-0014
HPV: GC7

CERTIFIED MAIL

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

Dear Mr. Knezevic:

This letter is to inform you that the Ohio EPA has completed a review of the resubmitted quarterly reports from the years 2005 and 2006 that were received at our office on November 3, 2008. The Ohio EPA has also completed reviewing Elyria Foundry's 2007 and 2008 quarterly reports.

Elyria Foundry had been notified of some of these violations in letters dated October 18, 2007, November 21, 2007, April 3, 2008, and June 25, 2008. Several of these violations are persisting and need to be addressed by Elyria Foundry.

The following (Attachment A) is a list of violations contained within the quarterly reports that were resubmitted by Elyria Foundry. There may exist some discrepancies between Elyria Foundry's and Ohio EPA's identification and counting of violations. When data could not be interpreted by the Ohio EPA, it was counted as a deviation. Several of the violations in past correspondences have been addressed by Elyria Foundry (applying for permits or instituting improved monitoring practices) and may not appear within this letter. However, it is clear that deviations are continuing at the facility.

In past correspondences and reports, Elyria Foundry has indicated existing permits will be modified and facility personnel will be trained in order to return to compliance; however, deviations are continuing. Please submit **within three weeks of receipt of this letter**, a detailed compliance plan that indicates when new permit-to-install (PTI) applications will be submitted, and other pertinent actions being taken by Elyria Foundry in order to return to compliance.

MR. SAMUEL KNEZEVIC
FEBRUARY 3, 2009
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The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06 or for USEPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Failure to respond to this notice in the time frame specified may result in further enforcement action. This letter does not excuse any violations of local, state, and federal laws regarding air pollution control. Should you have any questions regarding this notice, please feel free to contact me at (330) 963-1252 or via e-mail at erik.bewley@epa.state.oh.us.

Respectfully,



Erik M. Bewley
Environmental Specialist
Division of Air Pollution Control

EMB:bo

cc: Tim Fischer, Ohio EPA-NEDO, DAPC
Lisa Holscher, Region V, USEPA
Tom Kalman, Ohio EPA-CO, DAPC

ec: Dennis Bush, Ohio EPA-NEDO, DAPC

ATTACHMENT A

F001 (Electric Melting Furnace #1)

- Particulate emissions exceeded 8.25 tons per rolling 12-month period (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
January - March 2008 and May - December 2008
- Production exceeded 11,000 tons per rolling 12-month summation (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
January, May - December 2008

F002 (Electric Melting Furnace #2)

- Particulate emissions exceeded 8.25 tons per rolling 12-month period (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
May, July - November 2007
- Production exceeded 11,000 tons per rolling 12-month summation (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
April, May, July - November 2007

F004 (Electric Melting Furnace #4)

- Particulate emissions exceeded 8.25 tons per rolling 12-month period (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
November and December 2008
- Production exceeded 11,000 tons per rolling 12-month summation (per PTI 02-12455 issued March 31, 1999 and Title V Permit issued January 9, 2002)
November and December 2008

F006 (#2 Core Dept. Mixer - CE Cast)

- Particulate emissions exceeded 1.7 pounds per hour (per PTI 02-10900 issued March 19, 1997 and Title V Permit issued January 9, 2002)
275 days in 2005
274 days in 2006
276 days in 2007
270 days in 2008

F007 (#3 Iron Inoculation)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
124 days in 2005

F009 (CL Blow-Off Station)

- Fabric filter was not in place (per PTI 02-5515 modified January 23, 1992 and Title V Permit issued January 9, 2002)
 - 152 days in 2007
 - 205 days in 2008

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 77 days in 2005
 - 27 days in 2006
 - 31 days in 2007

F010 (BMM Casting/Cooling)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 7 days in 2005
 - 2 days in 2006
 - 28 days in 2007
 - 39 days in 2008

- Production exceeded 3.2 tons per hour, compliance was not demonstrated at a higher production rate (per Title V Permit issued January 9, 2002)
 - January - September 2005
 - January - December 2006
 - January - December 2007
 - January - December 2008

- Production exceeded 15,360 tons per rolling 12-month summation (per Title V Permit issued January 9, 2002)
 - December 2007
 - January - July, September, October 2008

- Failed to report malfunction of the baghouse (per OAC rule 3745-15-06)
 - 9 days in 2007
 - 5 days in 2008

- Operating hours exceeded 4,800 hours per rolling 12-month summation (per PTI 02-8154 modified May 11, 1995 and Title V Permit issued January 9, 2002)
 - October - December 2006
 - January - May 2007

F011 (BMM Cleaning/Grinding)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 181 days in 2005
 - 227 days in 2006

232 days in 2007
72 days in 2008

- Production exceeded 22 tons per hour, compliance was not demonstrated at a higher production rate (per Title V Permit issued January 9, 2002)

January - December 2005
January - December 2006
January - December 2007
January - December 2008

- Failed to report malfunction of the baghouse (per OAC rule 3745-15-06)
3 days in 2007

- Operating hours exceeded 4,800 hours per rolling 12-month summation (per PTI 02-8154 modified May 11, 1995 and Title V Permit issued January 9, 2002)

October - December 2006
January - May 2007

F016 (#2 Core Department Mixer - Palmer)

- Particulate emissions exceeded 0.82 pound per hour (per PTI 02-11167 issued September 10, 1997 and Title V Permit issued January 9, 2002)

271 days in 2005
273 days in 2006
270 days in 2007
265 days in 2008

- Visible emission readings were not taken (per Title V Permit issued January 9, 2002)

271 days in 2005
274 days in 2006
270 days in 2007
96 days in 2008

F018 (#1 Core Department Mixer - Palmer)

- Particulate emissions exceeded 0.6 pound per hour (per PTI 02-9188 issued May 17, 1995 and Title V Permit issued January 9, 2002)

271 days in 2005
271 days in 2006
273 days in 2007
268 days in 2008

- Visible emission readings were not taken (per Title V Permit issued January 9, 2002)

271 days in 2005
273 days in 2006

273 days in 2007
96 days in 2008

F019 (North Holding Furnace)

- Melted Iron in the Furnace (per PTI 02-11167 issued September 10, 1997 and Title V Permit issued January 9, 2002)

20 days in 2005
270 days in 2006
277 days in 2007
76 days in 2008

F020 (South Holding Furnace)

- Melted Iron in the Furnace (per PTI 02-11167 issued September 10, 1997 and Title V Permit issued January 9, 2002)

20 days in 2005
270 days in 2006
277 days in 2007
76 days in 2008

F021 (Foundry #2 Self Managed Mixer)

- Particulate emissions exceeded 4.65 pounds per hour (per PTI 02-11997 issued September 10, 1998 and Title V Permit issued January 9, 2002)

271 days in 2005
273 days in 2006
270 days in 2007
268 days in 2008

F022 (#2 Core Department Palmer M200 Sand Mixer)

- Particulate emissions exceeded 1.8 pounds per hour (per PTI 02-13610 issued February 9, 2000 and Title V Permit issued January 9, 2002)

119 days in 2006
262 days in 2007
268 days in 2008

F023 (#1 Foundry CE Sand Mixer)

- Particulate emissions exceeded 3.5 pounds per hour (per PTI 02-14154 issued August 22, 2000 and Title V Permit issued January 9, 2002)

272 days in 2005
268 days in 2006
267 days in 2007
264 days in 2008

P004 (6 Foot Shot Blast)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 15 days in 2005
 - 126 days in 2006
 - 67 days in 2007
 - 45 days in 2008

- Failed to report malfunction of the baghouse (per OAC rule 3745-15-06)
 - 6 days in 2007
 - 5 days in 2008

P005 (8 Foot Shot Blast)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 77 days in 2005
 - 28 days in 2006

P006 (Vac-Blast)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 11 days in 2005
 - 174 days in 2006
 - 67 days in 2007
 - 65 days in 2008

- Failed to report malfunction of the baghouse (per OAC rule 3745-15-06)
 - 6 days in 2007
 - 5 days in 2008

P007 (Cut-off Saw)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 192 days in 2005
 - 137 days in 2006
 - 67 days in 2007
 - 74 days in 2008

Elyria Foundry believes this emissions unit to be *de minimis*
Not clear if pressure drop readings are continuing to be recorded.

- Fabric filter was not in place (per Title V Permit issued January 9, 2002)
 - 192 days in 2007

P008 (N. Plant Sand Reclamation)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 15 days in 2005
 - 31 days in 2006
 - 82 days in 2007
 - 67 days in 2008

P017 (Meltshop Inoculation)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 174 days in 2005
 - 252 days in 2006
 - 187 days in 2007
 - 99 days in 2008
- Dust collector not used (per Title V Permit issued January 9, 2002)
 - 224 days in 2007
 - 70 days in 2008
- Failed to report malfunction of the baghouse (OAC rule 3745-15-06)
 - 2 days in 2007

P023 (Shakeout #1)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 187 days in 2005
 - 257 days in 2006
 - 229 days in 2007
 - 59 days in 2008

P024 (Shakeout #2)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 243 days in 2005
 - 256 days in 2006
 - 126 days in 2007
 - 61 days in 2008

P026 (Shakeout #3)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 174 days in 2005
 - 252 days in 2006
 - 187 days in 2007
 - 103 days in 2008

P027 (MS Sand Reclamation)

- Pressure drop out of range (per Title V Permit issued January 9, 2002)
 - 239 days in 2005
 - 261 days in 2006
 - 198 days in 2007
 - 93 days in 2008
- Failed to report malfunction of baghouse (per OAC rule 3745-15-06)
 - 1 day in 2007

Visible emission readings were not taken for the following Emissions units: F001, F002, F003, F004, F010, F011, F019, F020, F021, F022, F023, P010 (per the Title V Permit issued January 9, 2002)

- 11 days in 2005
- 14 days in 2006
- 10 days in 2007

The following emissions units are not included in the Title V Permit, but received permits- to-install.

P030 (Disa Goff Shot Blast)

- Visible emission readings were not taken during the 1st quarter 2008 (per PTI 02-22407 issued December 29, 2006)

P031 (Scrap Dryer)

- Visible emission readings were not taken during the 1st quarter 2008 (per PTI 02-22635 issued August 7, 2007)
- Operated without a baghouse for 48 days during the 1st quarter 2008 (per PTI 02-22635 issued August 7, 2007)

P901 (11 Ton Electric Furnace)

- Visible emission readings were not taken during the 1st quarter 2008 (per PTI 02-22635 issued August 7, 2007)
- Operated without a baghouse from February 13, 2008 through March 31, 2008 (per PTI 02-22635 issued August 7, 2007)
- Exceeded emission levels of 0.02 grains per dry standard cubic foot. (per PTI 02-22635 issued August 7, 2007)

P903 (BMM Inoculation)

- Operated without a PTI from February 26, 2007 through December 19, 2008, when permit #P0103845 was issued final.
- Emitted particulate matter levels up to 16.52 pounds per hour.