



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 18, 2007

RE: NOTICE OF VIOLATION
0247040014
CERTIFIED MAIL

Mr. Chuck Harley, Plant Engineer
Elyria Foundry
120 Filbert St.
Elyria, OH 44036

Dear Mr. Harley:

Thank you for the courtesy that you extended to me during my inspection on Wednesday, September 26, 2007. The inspection was conducted to determine Elyria Foundry's compliance status with their Title V Permit and Permits-to-Install. The following is a summary of what was inspected and a brief commentary on each.

F001 through F004 (Furnaces)

- Several of the furnaces were operating during the visit.
- The area was under considerable construction awaiting the arrival of two new melting furnaces and a scrap dryer.
- Visible emissions being emitted to the atmosphere were not noticed during the inspection.
- Copies of melt records were obtained. Upon review of the annual production rate melting records, it was noted, for F002, that based upon a 12-month rolling summation, the limitation of 11,000 tons of metal was exceeded. The exceedence occurred during July and August 2007. This is a violation of the Title V Permit. Please submit, within two weeks of receipt of this letter, melt records from January 2005 through September 2007.
- A deviation report for the 12-month rolling summation exceedence has not been received by the Ohio EPA. This is a violation of the Title V Permit. Please submit, within three weeks of receipt of this letter, corrected quarterly deviation reports.

F005, F006, F015 through F018, F021 through F023 (Sand Mixers)

- Copies of sand, resin, and catalyst records were obtained. These records are currently under review. Ohio EPA has sent correspondence to Elyria Foundry requesting assistance interpreting the log sheets.
- No visible emissions were noted leaving the buildings that house these emissions units.

F009 (Blow-Off Station)

- This emissions unit was not operating during the inspection.
- Baghouse #5 controlled this emissions unit; however, baghouse # 5 has been removed.
- Please submit a letter that identifies which baghouse this emissions unit is now vented and any other operational changes made to the emissions unit.

F010 (Casting Cooling)

- This emissions unit was operating during the inspection.
- Baghouse #11 controls this emissions unit with an allowable pressure drop range of 4" – 8" of water. During the inspection the North side baghouse had a reading of 5" of water while the South side baghouse had a reading of 5.8" of water.
- Currently, there are production limitations and operating restrictions within the Title V Permit placed on this emissions unit. Please submit, within two weeks of receipt of this letter, the production and operating hours of this emissions unit from January 2005 through September 2007.

F011 (Grinding/Cleaning)

- This emissions unit was operating during the inspection.
- Baghouses #9 and #10 control this emissions unit with an allowable pressure drop range of 4" – 8.5" of water. During the inspection baghouse #9 had a pressure drop reading of 10" of water, which is in violation of the Title V Permit. Baghouse #10 had a pressure drop reading of 8.2" of water.
- A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #9 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit. Please submit, within two weeks of receipt of this letter, pressure drop readings for this emissions unit dating from January 2005 through September 2007. In addition, please submit, within three weeks of this letter, corrected quarterly deviation reports that identify all days in which the baghouse was operating out of the allowable pressure drop range.
- Currently, there are production limitations and operating restrictions placed on this emissions unit within the Title V Permit. Please submit, within two weeks of receipt of this letter, the production and operating hours of this emissions unit from January 2005 through September 2007.

F012 through F014 (Pouring)

- These emissions units were not viewed during the inspection. The Title V permit does not contain requirements for these emissions units.

F019 and F020 (Holding Furnaces)

- Currently, the Title V Permit contains restrictions on production from these emissions units. Please submit, within two weeks of receipt of this letter, the production records from January 2005 through September 2007, for these emissions units.
- No visible emissions were noted from the building housing these emissions units.

K002 (Painting)

- Please submit, within two weeks of receipt of this letter, all coating records associated with this emissions unit from January 2005 through September 2007.

P004 (Six-Foot Shot Blast)

- This emissions unit is no longer controlled by baghouse #1. Baghouse #1 was removed in April 2005, and now the emissions unit is controlled by baghouse #2.
- This emissions unit was not operating during the inspection.

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- The allowable pressure drop across baghouse #1 was 4" – 8" of water. The allowable pressure drop across baghouse #2 is 4" – 8.5" of water. The reading on baghouse #2, during the inspection was 7.8" of water.
- A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #2 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
- Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #1 and baghouse #2 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.
- No visible emissions were noted from the baghouse.

P006 (Vac-Blast)

- This emissions unit is controlled by baghouse #2. The pressure drop reading across baghouse #2 during the inspection was 7.8" of water. The allowable pressure drop across baghouse #2 is 4"-8.5" of water.
- It has been noted that P004 now shares baghouse #2 with this emissions unit.
- No visible emissions were noted from the baghouse.
- A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #2 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
- Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #2 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.

P008 and P027 (Sand Reclamation)

- o P008 is controlled by baghouses #3 and #4.
- o During the inspection, baghouses #3 and #4 were operating at a pressure drop of 5" of water. The allowable range is listed as 4" – 8.5" of water.
- o No visible emissions were noted from the baghouse.

- o P027 is controlled by baghouse #13.
- o Baghouse #13 was not operating during the inspection.
- o The allowable pressure range across baghouse #13 is listed as 4" – 8.5" of water.
- o A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #13 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
- o Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #13 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.
- o No visible emissions were noted from the baghouse.

P017 (Meltshop Inoculation)

- This emissions unit is controlled by baghouse #17. This emissions unit was not operating during the inspection. However, the baghouse fan was on and air flow was circulated to the baghouse.

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- The permit states the pressure drop range is to be between 4" – 10" of water. During the inspection, the pressure drop across the baghouse was 12" of water. This is in violation of the Title V Permit.
- No visible emissions were noted from the baghouse.
- A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #17 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
- Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #17 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.

P023, P024, and P026 (Shakeouts)

- These emissions units were not operating during the inspection.
 - o P023 typically begins operations at 7 PM.
 - o Baghouse #8 controls this emissions unit, with an allowable pressure drop range of 4" to 8.5" of water.
 - o During the inspection the pressure drop across baghouse #8 was 10.5" of water, which is in violation of the Title V Permit.
 - o A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #8 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
 - o No visible emissions were noted from the baghouse
 - o Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #8 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.
 - o P024 typically begins operations at 2 PM
 - o Baghouse #15 controls this emissions unit, with an allowable pressure drop range of 4" to 8.5" of water.
 - o During the inspection the pressure drop reading across this baghouse was 3" of water, which is in violation of the Title V Permit.
 - o A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #15 has not been met. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
 - o No visible emissions were noted from the baghouse.
 - o Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #15 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.
 - o P026 typically begins operations at 12 AM
 - o Baghouse # 17 controls this emissions unit, with an allowable pressure drop range of 4" to 10" of water.
 - o During the inspection the pressure drop reading across this baghouse was 12" of water, which is in violation of the Title V Permit.
 - o No visible emissions were noted from the baghouse.

- o A random review of pressure drop recordings indicates that the allowable pressure drop across baghouse #17 has been exceeded. The Ohio EPA has not received a deviation report for these deviations. This is in violation of the Title V Permit.
- o Please submit, within two weeks of receipt of this letter, the pressure drop readings across baghouse #17 from January 2005 through September 2007. In addition, within three weeks of receipt of this letter, please submit corrected quarterly deviation reports for this emissions unit.

P029 (Core and Mold Wash Operations)

- This emissions unit was not observed during the inspection.

P030 (Disa-Goff Blast Machine)

- The visible record log that was obtained during the inspection does not include a column for this emissions unit. Per the PTI, visible emissions (VE) checks are required to be performed.
- Within two weeks of receipt of this letter, please submit the VE logs for this emissions unit from the first day of operation through September 2007.

P031 (Scrap Preheater)

- Not yet installed.

P901 (Furnace #11)

- Not yet installed.

P902 (Furnace #12)

- Not yet installed.

Emissions Units that have been removed

- F007 - #3 Iron Inoculation.
- P005 - Eight Foot Shot Blast.
- P007 - Cut-Off Saw.
- P010 - Scrap Dryer.
- P028 - T Reclamation System.

Other Areas of Concern

- Sand was seen being emitted from a pipe leading to a silo and from atop the silo just outside the BMM area. It appeared a hole was in an elbow that was leading to the silo. Within three weeks of receipt of this letter, please provide an explanation on what occurred to cause the visible emissions and what steps plan to be put in place to reduce/eliminate emissions.
- Inside the building that houses the BMM, while we where recording the pressure drop across the baghouse, it was noted that a fine grit was showering us from above. This indicated to me the pick-up points for the BMM operations within the building are inadequate or plugged. Within three weeks of receipt of this letter, please provide a written explanation of what Elyria Foundry has done or plans on doing to ensure good engineering design to capture the particulate matter.
- You made mention of another paint spray booth located at the old York International Building. Within two weeks of receipt of this letter, please submit coating information and usage for this emissions unit. In addition, within three weeks of this letter, either submit a Permit-to-Install (PTI) Application or emission calculations that justify the emissions unit as not requiring a PTI.

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You indicated that in July of 2007, the Cut-Off Saw was removed. However, during the inspection, cut-off type operations were observed in the foundry. The operations generated large amounts of fumes/dust that may need to be permitted. Within two weeks of receipt of this letter, please submit either a Permit-to-Install (PTI) Application for this emissions unit or emission calculations that justify the emissions unit as not requiring a PTI.

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

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