



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

September 20, 2007

RE: **NOTICE OF VIOLATION**  
**ALEXANDER MILL SERVICES, LLC**  
**DAPC FACILITY # 02 50 00 0997**

**CERTIFIED MAIL**

Mr. John Alexander  
Alexander Mill Services, LLC  
897 Perry Highway  
Harmony, PA 16037

Dear Mr. Alexander:

This letter is being sent as a follow-up to our phone conversations on August 14 and September 18, 2007, and the site visits that were conducted by John Scrip of the Mahoning-Trumbull Air Pollution Control Agency on July 19 and August 14, 2007. These visits were made in response to visible emissions complaints from representatives of the Ohio EPA's Division of Hazardous Waste Management (DHWM) on July 16, August 9 and September 13, 2007. In preparation for these visits, it was also noted that a permit-to-operate (PTO) application has not been submitted for the installed emissions units, and the company is failing to perform the reporting requirements as stated in the permit-to-install (PTI). Specifically, your facility is operating in violation of the terms and conditions of PTI #02-19980 for emissions units F001 and P001 issued on November 23, 2004, as well as Ohio Administrative Code (OAC) rule 3745-31-02(A)(1), OAC rule 3745-35-02(B)(5), and Ohio Revised Code (ORC) 3704.05(C).

As mentioned during our conversations, the DHWM inspectors noted visible emissions coming from the chromite silo on July 16 and August 9, 2007, and documented the July emissions with photographs. Per section II.B.4 of the PTI for emissions unit P001, "the sand dryer and storage silos shall be vented to the control device at all times that the emissions unit is in operation." It is clear from the photographs that the storage silos are not being vented to any control device, which is a violation of the PTI terms and ORC 3704.05(C). Please submit a compliance plan to control these emissions, complete with time line and milestones, within **14 days of receipt of this letter**.

The DHWM inspectors also noted visible emissions coming from the scrubber stack on July 16 and August 9, 2007, and took photographs of the July emissions. Visible emissions from the scrubber stack are limited to 5% opacity

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as a six-minute average. The 5% limit essentially means that any time visible emissions are emanating from the stack there is the potential for a violation of the PTI and of ORC 3704.05(A). The emissions that were documented in the photograph indicate that an investigation of the scrubber is necessary to determine the cause of the emissions. Since similar emissions were observed on both July 16 and August 9, 2007, the problem is ongoing and is not an isolated incident. As we discussed in our telephone conversations, a malfunction as defined in OAC rule 3745-15-06(B) must be reported to our office immediately, and if the duration exceeds 72 hours, then a written report is required. The daily checks of the emissions from the stack and the control device operating parameter monitoring have been established in the PTI so that malfunctions can be quickly detected and resolved. Please submit a compliance plan to correct these emissions, along with a preventive maintenance plan to abate future occurrences, within **14 days of receipt of this letter**.

Another area of concern is the loading of the dried material into trucks. According to the PTI application, the material handling of the foundry sand throughout the process was considered *de minimis* per OAC rule 3745-15-05. These calculations were based on the inherent moisture of the foundry sand, the fugitive emission reduction due to the building enclosure, and the loading of only one truck per day. The unloading emission factor also assumes that the trucks are loaded pneumatically. However, while at your facility on September 13, 2007, the DHWM inspector observed the dried material being loaded into open dump trucks, creating a large amount of fugitive dust. From my conversation with you, this occurs several times a week, at a rate of about 12 open trucks per month. Particulate emissions (PE) from the truck loading can be calculated using an emission factor from Table 11.12-2 for truck loading in AP-42, "Compilation of Air Pollutant Emission Factors", Chapter 11.12 (Concrete Batching), Fifth Edition, dated 6/06:

$$(0.995 \text{ lb PE/ton}) \times (14 \text{ tons/truck}) \times (1 \text{ truck/day}) = 13.93 \text{ lbs PE/day}$$

This exceeds the *de minimis* threshold of 10 lbs/day, and it only takes one part of the material handling into consideration. The inclusion of the material handling emissions for all of the raw materials and products (which would include all material transfer points, material loading and material unloading) would greatly exceed the *de minimis* threshold. Therefore, the material handling operations are in violation of OAC rule 3745-31-02(A)(1), which requires a PTI prior to the modification or installation of a new air contaminant source. Please submit a PTI application for the material handling operations at your facility, including emissions calculations, within **30 days of receipt of this letter**.

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Please be reminded that there are specific requirements in your PTI for monitoring each of your emissions units and their control devices, and keeping records of the monitored data. These requirements can be found in section II.C of the PTI, and are intended to prevent the above-mentioned violations from occurring. Emissions unit F001 requires daily inspections of the unpaved roadways and parking areas to determine if control measures, such as watering, are necessary. This information shall be maintained in a log as specified in section II.C.4 of the PTI. Emissions unit P001 requires continuous monitoring of the scrubber pressure drop and water flow rate, and the cyclone pressure drop. Records of these parameters shall be maintained on a once per shift basis. Daily checks of the visible particulate emissions from the scrubber stack are also required to be performed and logged. Please submit a copy of these records from July 1, 2007 through the current date. If no records are available, please begin keeping these records immediately, and submit a copy of at least one week's worth of data within **30 days of receipt of this letter**.

There are also deviation reporting requirements contained in your PTI, which are intended to ensure that you are performing the necessary monitoring of your air emissions. Our office has not received a quarterly or semiannual report from you since the issuance of the PTI, which is a violation of the PTI terms and ORC 3704.05(C). The reporting requirements can be found in section II.D of the PTI for each emissions unit. Emissions unit F001, the unpaved roadways, require daily inspections with quarterly deviation reporting. These reports are due January 31, April 30, July 31 and October 31 of each year, and are required to be submitted even if no deviations occurred. Emissions unit P001, the sand drying process, requires semiannual reports (due by January 31 and July 31 of each year) of the daily checks, and quarterly deviation reports of the control device parameters. Please submit copies of these reports beginning from the start-up of your operation in early 2005 within **30 days of receipt of this letter**.

Finally, OAC rule 3745-35-02(B)(5) requires PTO applications to be submitted within 90 days after commencement of operation. A PTO application has not been received for the sources operating under PTI 02-19980, which began operation in early 2005. Copies of the PTO application and emissions activity category (EAC) forms are attached for your use. Please complete and submit these applications for your installed units within **30 days of receipt of this letter**.

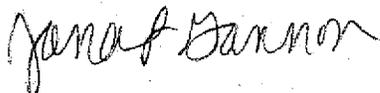
The submission of the above information does not constitute a waiver of Ohio EPA's authority to seek civil penalties, as provided in Section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date. This notice does not excuse any violations of federal, state and local laws or regulations regarding

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air pollution control. Failure to respond within the specified time frame can result in further enforcement action.

If you have any questions regarding this letter, please contact me at (330) 963-1261.

Sincerely,



Jana L. Gannon  
Environmental Specialist  
Division of Air Pollution Control

JLG:bo

enclosures

cc: Bob Prinic, Ohio EPA, DAPC, NEDO  
Tom Kalman, Ohio EPA, DAPC, CO  
Lisa Holscher, U.S. EPA, Region 5

ec: Dennis Bush, Ohio EPA, DAPC, NEDO  
Ed Fasko, Ohio EPA, DAPC, NEDO