



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 25, 2008

RE: NOTICE OF VIOLATION
DAPC FACILITY ID: 0247040014

CERTIFIED MAIL

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

Dear Mr. Knezevic:

The Ohio EPA is in receipt of the 1st Quarter 2008 deviation report submitted by Elyria Foundry, and received at the Ohio EPA on May 2, 2008. The quarterly report identified numerous deviations of both the Title V Permit and Permit-to-Install (PTI) permits. Below, please find Ohio EPA's comments and requests concerning each deviation reported.

F001 – Furnace #1

Deviation: The rolling 12-month production rate of 11,000 tons was exceeded in January 2008 (11,035 tons) in violation of the Title V Permit.

Discussion: Elyria Foundry reported that administrative controls and training would be put in place to ensure future compliance.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that includes what administrative controls/training has been put in place to ensure future 12-month rolling summations are not exceeded. The compliance schedule should give a date by which the emissions unit will return to compliance.

Deviation: Due to the increase in the production rate, the annual allowable emissions rate (8.25 TPY of Particulate Matter; PM) was exceeded (8.28 TPY of PM).

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions would be applied for. A PTI application was received for the modification, then withdrawn, pending facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F006 - #2 Core Dept. Mixer CE Cast

Deviation: The PM emission limitation was exceeded for a period of 70 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions would be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F010 – Casting Cooling BMM

Deviation: Baghouse pressure drop out of range for 25 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule would be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Exceeded (Jan. 15445 tons; Feb. 15668 tons; and March 15551 tons) the production rate at which the most recent compliance test demonstrated compliance (15360 tons).

Discussion: Elyria Foundry reported that a new stack test will be scheduled to demonstrate compliance at a higher production rate.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Before a stack test can be conducted, to set a higher production rate, an Intent To Test (ITT) needs to be submitted to NEDO 30 days prior to the test.

Deviation: Exceeded (Jan. 7.14 TPH; Feb. 7.21 TPH; and March 6.81 TPH) the allowable hourly production rate (3.2 tons per hour).

Discussion: Elyria Foundry reported that a new stack test will be scheduled to demonstrate compliance at a higher production rate.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Before a stack test can be conducted, to set a higher production rate, an Intent To Test (ITT) needs to be submitted to the Northeast District Office (NEDO) 30 days prior to the test.

F011 – Cleaning/Grinding BMM

Deviation: Baghouse pressure drop out of range for 61 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Exceeded (Jan. 15445 tons; Feb. 15668 tons; and March 15551 tons) the production rate at which the most recent compliance test demonstrated compliance (15360 tons).

Discussion: Elyria Foundry reported that a new stack test will be scheduled to demonstrate compliance at a higher production rate.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Before a stack test can be conducted to set a higher production rate, an Intent To Test (ITT) needs to be submitted to the NEDO 30 days prior to the test.

Deviation: Exceeded (Jan. 58.35 TPH; Feb. 66.49 TPH; and March 65.65 TPH) the production rate at which the most recent compliance test demonstrated compliance (22 tons per hour).

Discussion: Elyria Foundry reported that a new stack test will be scheduled to demonstrate compliance at a higher production rate.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Before a stack test can be conducted, to set a higher production rate, an Intent To Test (ITT) needs to be submitted to NEDO 30 days prior to the test.

F016 - #2 Core Dept. Mixer – Palmer

Deviation: Daily checks of visible emissions (VE) were not performed.

Discussion: Elyria Foundry will add this emissions unit to the daily VE checklist.

Action Request: Please submit within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Hourly emissions exceeded (average of 1.85 pounds) the allowable (0.82 pounds) emissions for 70 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions will be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F018 - #1 Core Dept. Mixer – Palmer

Deviation: Daily checks of visible emissions (VE) were not performed.

Discussion: Elyria Foundry will add this emissions unit to the daily VE checklist.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Hourly emissions exceeded (average of 2.22 pounds) the allowable (0.6 pounds) emissions for 72 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions will be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F019 - #6 Furnace

Deviation: Furnace was used for melting for 72 days.

Discussion: The PTIs that were received, then withdrawn, from Elyria Foundry did not request that this emissions unit be allowed to melt iron. Elyria Foundry has discontinued the process of melting in this furnace.

Action Request: Please submit, within three weeks of receipt of this letter, an estimate of emissions that were emitted from the melting of iron in this furnace, provide all emission factors, assumptions, and tonnage numbers.

F020 - #5 Furnace

Deviation: Furnace was used for melting for 72 days.

Discussion: The PTIs that were received, then withdrawn, from Elyria Foundry did not request that this emissions unit be allowed to melt iron. Elyria Foundry has discontinued the process of melting in this furnace.

Action Request: Please submit, within three weeks of receipt of this letter, an estimate of emissions that were emitted from the melting of iron in this furnace, provide all emission factors, assumptions, and tonnage numbers.

F021 - #2 Foundry Self-Managed Mixer

Deviation: Hourly emissions exceeded (average of 7.83 pounds) the allowable (4.65 pounds) emissions for 70 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions will be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F022 - #2 Core Dept. Palmer M200 Sand Mixer

Deviation: Hourly emissions exceeded (average of 1.84 pounds) the allowable (1.8 pounds) emissions for 70 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions will be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

F023 - #1 Foundry CE 2000 lbs/hr Sand Mixer

Deviation: Hourly emissions exceeded (average of 9.56 pounds) the allowable (3.5 pounds) emissions for 70 days.

Discussion: Elyria Foundry reported that a PTI modification to increase allowable emissions will be applied for. A PTI application was received for the modification, then withdrawn, pending further facility investigation into facility PM emissions.

Action Request: Please submit, within three weeks of receipt of this letter, an update on the status of facility PM emissions and a compliance schedule that provides a date by which the emissions unit will return to compliance.

P004 - 6 foot Shot Blast

Deviation: Baghouse pressure drop out of range for 8 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

P006 – Vac-Blast

Deviation: Baghouse pressure drop out of range for 8 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

P007 – Cut-Off saw

Deviation: Relocated the emissions unit without baghouse control.

Discussion: Elyria Foundry is in negotiations with Ohio EPA regarding emission factors and potential to emit calculations to determine if this emissions unit is *de minimis*.

Action Request: The Title V Permit requires this emissions unit to be controlled by a baghouse. Until a determination has been made as to the status of the emissions unit, and until the Title V Permit is modified, the emissions unit should be controlled by a baghouse. Please submit a compliance schedule that provides a date by which the emissions unit will return to compliance.

P008 – N. Plant Reclamation

Deviation: Baghouse pressure drop out of range for 41 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Permit states that baghouses #3 and #4 shall be used to control emissions unit and the emissions unit is currently controlled only by baghouse #4.

Discussion: The use of one baghouse may be sufficient; however, the pressure drop being out of range for 41 days may be indicative that two baghouses are required. This unit will need to be emissions tested to determine if the one baghouse control scheme is sufficient. Elyria Foundry plans on connecting this emissions unit to a new control device.

Action Request: Before stack testing can be conducted to determine if one baghouse is sufficient control, an Intent To Test (ITT) needs to be submitted to the NEDO 30 days prior to the test.

P017 – Meltshop Inoculation

Deviation: Baghouse pressure drop out of range for 21 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Did not inoculate under the dust collector hood. Used sandwich method. This took place over a period of 70 days.

Discussion: The Sandwich Method of inoculation is operationally different than the Porous Plug Method of inoculation. Elyria Foundry should have requested a PTI exemption letter in order to test new operational methods (Sandwich Method versus Porous Plug Method).

Action Request: Please explain the difference in Sandwich Method versus Porous Plug Method of inoculation. Please highlight operational differences and include why a baghouse was not used during the Sandwich Method. Additionally, include emission estimate differences between the two methods.

P023 – Shakeout #1

Deviation: Baghouse pressure drop out of range for 52 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

P024 – Shakeout #2

Deviation: Baghouse pressure drop out of range for 37 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Emissions units being re-routed to different baghouses without informing the Ohio EPA.

Discussion: Any re-routing of control devices, the Ohio EPA needs to be informed.

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Action Request: Please submit, within three weeks of receipt of this letter, an accurate list of emissions units and their accompanying control devices.

P026 – Shakeout #3

Deviation: Baghouse pressure drop out of range for 21 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Emissions units being re-routed to different baghouses without informing the Ohio EPA.

Discussion: Any re-routing of control devices, the Ohio EPA needs to be informed.

Action Request: Please submit, within three weeks of receipt of this letter, an accurate list of emissions units and their accompanying control devices.

P027 MS Sand Reclaim

Deviation: Baghouse pressure drop out of range for 21 days.

Discussion: Elyria Foundry reported the Preventive Maintenance schedule will be updated.

Action Request: Please submit, within three weeks of receipt of this letter, a progress report of the Preventive Maintenance Plan (Plan). If the Plan is completed, please submit and a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Failed to stack test.

Discussion: Emissions unit will need to be stack test.

Action Request: Before a stack test can be conducted, an Intent To Test (ITT) needs to be submitted to NEDO 30 days prior to the test.

The following deviations are from emissions units that are not yet incorporated into the Title V Permit. These deviations show non-compliance with the emissions units PTI.

P030 – Disa GOFF twin table 8 foot Blast Machine

Deviation: Visible emission checks were not taken.

Discussion: This is in violation of PTI 02-22407 issued final on 12/29/2006.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance.

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P031 – Scrap Preheater for Furnaces #11 and #12

Deviation: Visible emission checks were not taken.

Discussion: This is in violation of PTI 02-22635 issued final on 08/07/2007.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Operating with a baghouse for 48 days.

Discussion: This is in violation of PTI 02-22635 issued final on 08/07/2007.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Additionally, please provide emission estimates for the period of time in which the baghouse was not installed/not operational.

P901 – Furnace #11

Deviation: Visible emission checks were not taken.

Discussion: This is in violation of PTI 02-22635 issued final on 08/07/2007.

Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance.

Deviation: Operating with a baghouse.

Discussion: This is in violation of PTI 02-22635 issued final on 08/07/2007.

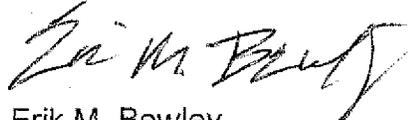
Action Request: Please submit, within three weeks of receipt of this letter, a compliance schedule that provides a date by which the emissions unit will return to compliance. Additionally, please provide emission estimates for the period of time in which the baghouse was not installed/not operational.

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. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

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If you have any questions regarding this letter, please contact me at (330) 963-1252 or via e-mail erik.bewley@epa.state.oh.us.

Respectfully,



Erik M. Bewley
Environmental Specialist
Division of Air Pollution Control

EMB:bo

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