



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

Re: MCM Precision Castings, Inc.
13133 Beech Street
Weston, OH 43569
Premise #0387000315
Notice of Violation (NOV/non-HPV)

June 25, 2012

CERTIFIED MAIL

Mr. Don Marion, President
MCM Precision Castings, Inc.
13133 Beech Street
Weston, Ohio 43569

Dear Mr. Marion:

This letter shall serve as the follow-up to the inspection that I conducted representing the Division of Air Pollution Control (DAPC) on May 22, 2012 of the above referenced facility. The purpose of the inspection was to get an inventory of the operating emission units as well as determining the compliance status of the air contaminant sources located at MCM Precision Castings, Inc. (herein referred to as MCM) with the rules and regulations of DAPC. The last inspection prior to this most recent one was conducted on March 12, 1992.

Based on my discussions with you, my observations during the inspection and a review of the company files at the Northwest District Office (NWDO), the findings are summarized as follows:

1. MCM was issued a final Permit to Install (PTI) #03-6447 on May 20, 1992, for eight separate emissions units. The permitted emission units are as follows:

EU ID #	Source Identification	Control Equipment
P001	440 lbs/hr Electric Induction Furnace	Baghouse
P002	440 lbs/hr Hot Metal Pouring	Baghouse
P003	Castings Knock-out	Baghouse
P004	Casting Cut-off Saw	Baghouse
P005	Abrasive Blast Cabinet	Baghouse
P006	Grinders	Baghouse
P007	Natural Gas-Fired Bake-out Oven	None
P008	Natural Gas-Fired De-wax Oven	Afterburner

2. During the tour, it appeared that the castings knock-out (P003) did not have any control measures. It was asked to have this emissions unit operate while I was there. Fugitive dust emissions were excessive during the operation of this emissions unit.

Since the Best Available Technology (BAT) determination was made to have this emissions unit controlled by a baghouse [which it was] when it was permitted, the current uncontrolled configuration (uncontrolled) is in violation of Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) and Ohio Revised Code (ORC) §3704.05. A compliance plan must be submitted that ensures continuous compliance of this emissions unit with the permit terms and conditions.

3. During the inspection, it was indicated that the casting cut-off saw (P004) had one manual and one hydraulic saw. It appeared that neither operation was vented to the baghouse which would be a violation of OAC rule 3745-31-05(A)(3) and ORC §3704.05. A compliance plan must be submitted that ensures continuous compliance of this emissions unit with the permit terms and conditions.
4. There are three individual abrasive blast machines (P005), one that uses sand media and two use steel shot. The permit application received on August 22, 1995 does not indicate there to be more than one blast cabinet. Please explain this discrepancy.
5. There are two manual and one automatic grinder (P006) that vent to the baghouse. In the permit application received on August 22, 1995, it only lists two grinders being in operation. Please explain this discrepancy.
6. On March 12, 2009, MCM started operating an 800 pound per hour electric induction furnace. MCM failed to apply for a Permit to Install and Operate (PTIO) application prior to the installation and operation of this emissions unit, therefore, MCM is in violation of OAC rule 3745-31-02 and ORC §3704.05. A completed PTIO application with an Emissions Activity Category (EAC) form and process flow diagram is required at this time for this emissions unit. Permit applications can be downloaded from Ohio EPA's website at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.
7. As expressed during the pre-inspection meeting, a similar facility's application will be sent to you electronically to assist you in filling out the applications and associated forms. Please do keep in mind that the current renewal applications cannot be processed at this time based on the inaccuracies that exist. It is necessary that MCM submit permit applications for the emission units identified in #1 above as well as the unpermitted source indicated in #6.
8. MCM is advised that this facility is subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart ZZZZZ (National Emission Standards for Hazardous Air Pollutants for Area Sources: Iron and Steel Foundries) and 40 CFR Part 63 Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants for Area Sources: Metal Fabrication & Finishing Source Nine Categories). The U.S. EPA is responsible for the administration of the requirements of these rules at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at this time. The complete requirements of these rules (including Part 63 General Provisions) may be accessed via the web from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov>.

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9. Please note that Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) that may be able to assist you in coming into compliance with the rules and regulations of DAPC. Additional information about this office can be found at <http://www.epa.ohio.gov/ocapp> or by calling OCAPP at 1-800-329-7518. The OCAPP representative at NWDO is Mr. Ron Nabors and he can be reached at (419) 373-3147 or ron.nabors@epa.ohio.gov.

The information requested above should be submitted to my attention by no later than July 31, 2012. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you should have any questions regarding this matter, please feel free to call (419) 373-3118 or by e-mailing mohammad.smidi@epa.ohio.gov.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

pc: DAPC-NWDO Facility File
Certified Mail Receipt Number 7009 1410 0001 1834 3723

ec: Andrea Moore, DAPC-NWDO
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Ron Nabors, OCAPP-NWDO
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