



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 06 2005

REPLY TO THE ATTENTION OF  
(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Randy Vonier, Quality Manager  
Multi-Cast Corporation  
P.O. Box 111  
225 East Linfoot Street  
Wauseon, Ohio 43567

Re: Finding of Violation  
Multi-Cast Corporation  
Wauseon, Ohio

Dear Mr. Vonier:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Finding of Violation (FOV) to Multi-Cast Corporation (you). We find that you are in violation of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production (40 C.F.R. Part 63, Subpart RRR), and Section 112 of the Clean Air Act, 42 U.S.C. § 7412, at your Wauseon, Ohio facility.

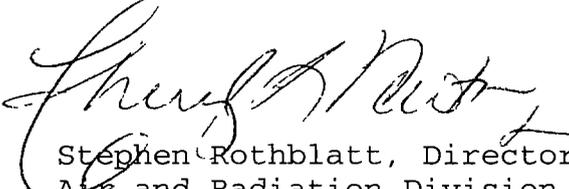
We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Reza Bagherian. You may call him at (312) 886-0674 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely,



Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency

Don Waltermeyer, APC  
Northwest District Office  
347 North Dunbridge Road  
Bowling Green, Ohio 43402

**United States Environmental Protection Agency  
Region 5**

**IN THE MATTER OF:** )  
 )  
Multi-Cast Corporation ) **FINDING OF VIOLATION**  
Wauseon, Ohio )  
 ) **EPA-5-04-OH-12**  
 )  
Proceedings Pursuant to )  
the Clean Air Act, )  
42 U.S.C. §§ 7401 et seq. )

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**FINDING OF VIOLATION**

The United States Environmental Protection Agency finds that Multi-Cast Corporation (Multi-Cast) is in violation of Section 112 of the Clean Air Act, 42 U.S.C. § 7412. Specifically, Multi-Cast Corporation is in violation of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production (40 C.F.R. Part 63, Subpart RRR) as follows:

**Regulatory Authority**

1. Pursuant to 40 C.F.R. § 63.1500(a), the requirements of Subpart RRR apply to the owner or operator of each secondary aluminum production facility.
2. A secondary aluminum production facility, as defined at 40 C.F.R. § 63.1503, includes any establishment using clean charge, aluminum scrap, or dross from aluminum production, as the raw material and performing one or more of the following processes: scrap shredding, scrap drying/delacquering/decoating, thermal chip drying, furnace operations (i.e., melting, holding, sweating, refining, fluxing, or alloying), recovery of aluminum from dross, in-line fluxing, or dross cooling.
3. Pursuant to 40 C.F.R. § 63.1500(c), the requirements of Subpart RRR pertaining to dioxin and furan (D/F) emissions and the associated operating, monitoring, reporting and recordkeeping requirements apply to each new and existing secondary aluminum processing unit, containing one or more group 1 furnace emission units processing other than clean

charge, located at a secondary aluminum production facility that is an area source of HAPs as defined in 40 C.F.R. § 63.2.

4. Pursuant to 40 C.F.R. § 63.1501, the owner or operator of an existing affected source must comply with the requirements of Subpart RRR by March 24, 2003; and the owner or operator of a new affected source that commences construction or reconstruction after February 11, 1999, must comply with the requirements by March 24, 2000, or upon startup, whichever is later.
5. Pursuant to 40 C.F.R. § 63.1501(c), the owner or operator of any affected source which is constructed or reconstructed at any existing aluminum die casting, aluminum foundry, or aluminum extrusion facility which otherwise meets the applicability criteria set forth in 40 C.F.R. § 63.1500 must comply with the requirements of this subpart by March 24, 2003 or upon startup, whichever is later.
6. Pursuant to 40 C.F.R. § 63.9(b)(2), the owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under Part 63 must notify the Administrator in writing that the source is subject to the relevant standard no later than 120 calendar days after the effective date of the relevant standard or within 120 calendar days after the source becomes subject to the relevant standard.
7. A group 1 furnace, as that term is defined at 40 C.F.R. § 63.1503, means a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricants, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing.
8. Pursuant to 40 C.F.R. § 63.1511(b), the owner or operator of any affected source must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit. The owner or operator of any existing affected source must conduct the initial performance test by the date for compliance established by 40 C.F.R. § 63.1501(a). The owner or operator of any new affected source must conduct the initial performance test within 90 days after the date for compliance established by 40 C.F.R. § 63.1501(b). Owners or operators of affected sources located at facilities which are area sources are subject only to those performance

testing requirements pertaining to D/F.

9. The provisions of 40 C.F.R. § 63.1512(e) provide, among other things, that the owner or operator of a group 1 furnace without add-on air pollution control devices, which processes other than clean charge material, must conduct emission tests to measure emissions of D/F at the furnace exhaust outlet.
10. Pursuant to 40 C.F.R. § 63.1506(a), the owner or operator must operate all new and existing affected sources and control equipment according to the requirements in 40 C.F.R. § 63.1506.
11. Pursuant to 40 C.F.R. § 63.1506(b), the owner or operator must provide and maintain easily visible labels posted at each group 1 furnace that identifies the applicable emission limits and means of compliance, including: (1) the type of affected source or emission unit, and (2) the applicable operational standard(s) and control methods.
12. Pursuant to 40 C.F.R. § 63.1515(b), the owner or operator of an existing affected source must submit a notification of compliance status report within 60 days of the compliance date established by 40 C.F.R. § 63.1501(a). A complete notification of compliance status report must include the information specified in paragraphs (1) through (10) of 40 C.F.R. § 63.1515(b).
13. Pursuant to 40 C.F.R. § 63.1516(b), the owner or operator of an affected source is required to submit semiannual reports, known as Excess Emission/Summary Reports, within 60 days after the end of each 6-month period. The report must contain the information specified in 40 C.F.R. § 63.10(c).

#### **Factual Background**

14. Multi-Cast owns and operates a secondary aluminum production facility at 225 East Linfoot Street, Wauseon, Ohio. Multi-Cast's facility uses clean charge and aluminum scrap in its aluminum production processes.
15. Multi-Cast owns and operates 12 gas-fired group 1 furnaces which melt aluminum. Multi-Cast's 12 furnaces were constructed or reconstructed before February 11, 1999.
16. Multi-Cast began melting painted and coated scrap in its 12 furnaces in April 2004. The 12 group 1 furnaces do not have

any add-on pollution control devices.

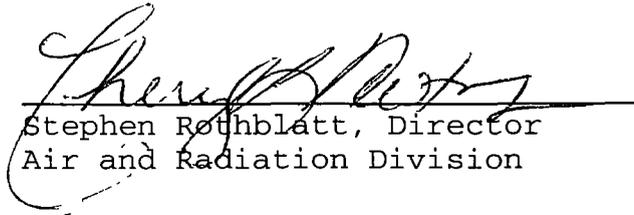
17. Multi-Cast's facility is an emission source subject to the requirements of the Act and 40 C.F.R. Part 63, Subpart RRR.
18. All 12 group 1 furnaces in operation at Multi-Cast's facility are existing affected sources under the requirements of 40 C.F.R. Part 63, Subpart RRR.
19. Multi-Cast does not have the potential to emit more than 10 tons per year of any single Hazardous Air Pollutant (HAP) or more than 25 tons per year of a combination of HAPs, and therefore is an area source of HAPs as defined in 40 C.F.R. § 63.2.
20. Multi-Cast has not notified the U.S. EPA that it is subject to the standards of 40 C.F.R. Part 63, Subpart RRR.
21. Multi-Cast has not conducted performance tests for D/F on each of its 12 group 1 furnaces and has not demonstrated initial compliance with the applicable D/F emission standard.
22. Multi-Cast has not provided and maintained easily visible labels posted at each group 1 furnace identifying the applicable emission limits and means of compliance.
23. Multi-Cast has not submitted a notification of compliance status report for its group 1 furnaces.
24. Multi-Cast has not submitted any semiannual Excess Emission/Summary Reports for its group 1 furnaces.

#### Violations

25. Multi-Cast failed to provide an initial notification to U.S. EPA that it was subject to 40 C.F.R. Part 63, Subpart RRR, in violation of 40 C.F.R. § 63.9(b)(2).
26. Multi-Cast failed to demonstrate initial compliance with the applicable D/F standard by conducting performance tests for D/F on each of its group 1 furnaces, in violation of 40 C.F.R. §§ 63.1511(b) and 63.1512(e).
27. Multi-Cast failed to provide and maintain visible labels posted at its group 1 furnaces, in violation of 40 C.F.R. § 63.1506.

- 28. Multi-Cast failed to submit a notification of compliance status report, in violation of 40 C.F.R. § 1515(b).
- 29. Multi-Cast failed to submit Excess Emission/Summary Reports within 60 days after the end of each 6-month period of operation of the group 1 furnaces, in violation of 40 C.F.R. § 63.1516(b).

6/6/05  
Date

  
Stephen Rothblatt, Director  
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Finding of Violation, No. EPA-5-04-OH-08, by Certified Mail, Return Receipt Requested, to:

Randy Vonier, Quality Manager  
Multi-Cast Corporation  
P.O. Box 111  
225 East Linfoot Street  
Wauseon, Ohio 43567

I also certify that I sent copies of the Finding of Violation by first class mail to:

Don Waltermeyer, APC  
Northwest District Office  
347 North Dunbridge Road  
Bowling Green, Ohio 43402

and

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

on the 7<sup>th</sup> day of June, 2004.

  
Loretta Shaffer, Secretary  
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: 70010320 0005 9025 6770