



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 29 2011

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerry Hynes
QA/EPA/ABS(CMU)
United Rolls Inc.
1400 Grace Avenue Northeast
Canton, Ohio 44705-2099

Dear Gerry Hynes:

This is to advise you that the U.S. Environmental Protection Agency has determined that United Rolls Inc. is in violation of the Clean Air Act (CAA or the Act) and associated state or local pollution control requirements at its facility at 1400 Grace Avenue Northeast, Canton, Ohio (facility). We are today issuing to you a Notice of Violation and Finding of Violation (NOV/FOV) for these violations.

The CAA requires the development of Primary and Secondary National Ambient Air Quality Standards to protect public health and welfare. To attain and maintain these standards, each state is required to develop an implementation plan. Ohio's State Implementation Plan (Ohio SIP) requires you to take reasonably available control measures to prevent particulate matter from becoming airborne and emitting from the facility. This requirement is incorporated into United Rolls Inc.'s Permit-to-Install (PTI) and Permit-to-Operate (PTO). The purpose of particulate limits is to help protect the public from unhealthy exposures to particulate. Particulate emissions, in particular fine particulate, contribute to respiratory problems, lung damage and premature deaths.

The Act also requires the development of standards for emissions of hazardous air pollutants (HAPs), called National Emission Standards for Hazardous Air Pollutants (NESHAPs). The purpose of the NESHAPs is to reduce HAPs, including certain metals, which pose a threat to human health. The NESHAP for Iron and Steel Foundries Area Sources, 40 C.F.R. Part 63, Subpart ZZZZZ, sets forth requirements to minimize emission of HAPs and requires you to submit reports.

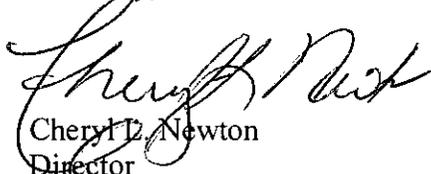
EPA finds that United Rolls Inc. has violated Ohio SIP requirements as incorporated into United Rolls Inc.'s PTI and PTO for its Canton facility. Because United Rolls Inc. violated its PTI and PTO, you have also violated Title I of the CAA and its implementing regulations, which require compliance with the Ohio SIP as well as the terms and conditions of operating permits. EPA also finds that United Rolls Inc. has violated the NESHAP for Iron and Steel Foundries Area Sources.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action and bringing a judicial criminal action.

We are offering you the opportunity to request a conference with us about the violations alleged in the NOV/FOV. A conference should be requested within 10 days following receipt of this notice. A conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any 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 take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contact in this matter is Michele Jencius. You may call her at 312.353.1377 if you wish to request a conference. If she is not available, you may also call Kevin Vuilleumier at 312.886.6188 to request a conference. EPA hopes that this NOV/FOV will encourage United Rolls Inc.'s compliance with the requirements of the CAA.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl D. Newton". The signature is written in a cursive style with a large initial "C".

Cheryl D. Newton
Director

Air and Radiation Division

cc: Terri Dzienis, Canton City Health Department
Ed Fasko, Ohio EPA NEDO

Enclosure

- c. OAC 3745-31-02(A)(3) states, “the transferee of any permit to install shall assume personally the responsibilities of the original permit holder-transferor...” On January 22, 2003, EPA approved OAC Rule 3745-31-02 as part of the federally enforceable SIP for Ohio. 68 Fed. Reg. 2909.
 - d. OAC 3745-17-08(B) requires you to take reasonably available control measures (RACM) to prevent dust from becoming airborne. OAC 3745-17-08(B)(3) requires the installation and use of control equipment to adequately enclose, contain, capture, vent and control the fugitive dust. On June 27, 1994, EPA approved OAC 3745-17-08(B) as part of the federally enforceable SIP for Ohio. 59 Fed. Reg. 27464, *revised* 75 Fed. Reg. 65567 (Oct. 26, 2010).
 - e. OAC 3745-15-06(B)(1) requires you to immediately notify OEPA of malfunctions of air pollution control equipment. In addition, OAC 3745-15-06(B)(2) requires that you notify Ohio EPA when you correct the condition causing the malfunction of air pollution control equipment. On October 1, 1982, EPA approved OAC 3745-15-06(B) as part of the federally enforceable SIP for Ohio. 47 Fed. Reg. 43377.
 - f. 40 C.F.R. § 52.23 allows EPA to take enforcement action under Section 113 of the Act, 42 U.S.C. § 7413, when a person fails to comply with any permit limitation or condition contained within a permit issued under a SIP-approved permit program.
2. The permits and permit conditions relevant to this NOV/FOV are as follows:
- a. On April 24, 2003, OEPA issued PTI 15-01337 to your facility for two induction furnaces, P041 and P042, and associated emission control devices.
 - i. P041 Condition II.A.2. requires you to minimize or eliminate visible particulate emissions using RACM, including venting at least 95% of the emissions from charging, melting, and tapping operations associated with P041 to the common baghouse.
 - ii. P042 Condition II.A.2. requires you to minimize or eliminate visible particulate emissions using RACM, including venting at least 95% of the emissions from charging, melting, and tapping operations associated with P042 to the common baghouse.
 - iii. Condition II.B.2. for P041 and P042 requires the pressure drop across the common baghouse be maintained within the range of 2 to 4 inches of water while any emissions unit vented to the common baghouse is in operation.
 - iv. Condition II.C.2.a for P041 and P042 requires the common baghouse monitoring system to constantly monitor the pressure differential across the baghouse and sound an audible alarm “when the pressure differential goes outside the range of 2 to 4 inches of water.”

- v. Condition II.C.2. for P041 and P042 requires you to “record the pressure drop across the common baghouse on a daily basis.”
 - vi. P041 Condition II.C.4. requires you to perform daily checks when P041 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving P041. You must note the presence or absence of any visible particulate emissions in an operations log.
 - vii. P042 Condition II.C.4. requires you to perform daily checks when P042 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving P042. You must note the presence or absence of any visible particulate emissions in an operations log.
 - viii. Condition II.D.2. for P041 and P042 requires you to submit quarterly pressure drop deviation (excursion) reports that identify all periods of time when the pressure drop across the common baghouse did not comply with the allowable pressure drop.
 - ix. Condition I.A.2.b. for P041 and P042 requires you to submit quarterly deviation reports by January 31, April 30, July 31 and October 31 for any deviations that occurred during the previous quarter.
 - x. Condition II.D.4. for P041 and P042 requires you to submit a semiannual report, by January 31 and July 31 for the previous 6-month period, that: 1) identifies all days during which any visible particulate emissions were observed from the common baghouse and/or any non-stack egress point serving these emission units; and 2) describes any corrective actions taken to eliminate the visible emissions.
 - xi. P041 Condition II.E.3.a. requires emission testing be conducted on P041 within the 6-month period prior to permit expiration. The PTO expired December 20, 2009.
 - xii. P042 Condition II.E.3.a. requires emission testing be conducted on P042 within the 6-month period prior to permit expiration. The PTO expired December 20, 2009.
- b. On January 20, 2004, the OEPA issued PTO P0101182 to your facility for two centrifugal casting machines, P028 and P901, and associated emission control devices.
- i. P028 Condition II.A.2.c requires you to minimize or eliminate visible particulate emissions using RACM, including ductwork, hoods, fans, etc. to capture particulate emissions and vent them to a baghouse. It also requires the collection efficiency to be sufficient to minimize or eliminate

- visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- ii. P901 Condition II.A.2.c requires you to minimize or eliminate visible particulate emissions using RACM, including ductwork, hoods, fans, etc. to capture particulate emissions and vent them to a baghouse. It also requires the collection efficiency to be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
 - iii. P028 Condition II.B.1 requires the pressure drop across the baghouse serving P028 be maintained within the range of 2 to 5 inches of water, while P028 is in operation.
 - iv. P901 Condition II.B.1 requires the pressure drop across the baghouse serving P901 be maintained within the range of 2 to 5 inches of water, while P901 is in operation.
 - v. Condition II.D.1 for P028 and P901 requires you to submit quarterly pressure drop deviation (excursion) reports that identify all periods of time when the pressure drop across the baghouse did not comply with the allowable pressure drop.
 - vi. Condition I.A.3.b. for P028 and P901 requires you to submit quarterly deviation reports by January 31, April 30, July 31 and October 31 for any deviations that occurred during the previous quarter.
 - vii. P028 Condition II.E.2.a. requires emission testing be conducted on P028 within the 6-month period prior to permit expiration. The PTO expired December 20, 2009.
 - viii. P901 Condition II.E.2.a requires emission testing be conducted on P901 within the 6-month period prior to permit expiration. The PTO expired December 20, 2009.
- c. On January 20, 2004, the OEPA issued PTO P0101184 to your facility for: induction furnaces, P003, P034, P035, P041 and P042; the inoculation process, P036; the pouring/casting process, F004; and associated emission control devices.
- i. P034 Condition II.A.2.c requires you to minimize or eliminate visible particulate emissions using RACM, including venting at least 95% of the emissions from charging, melting, and tapping operations associated with P034 to the common baghouse.
 - ii. P041 Condition II.A.2.c requires you to minimize or eliminate visible particulate emissions using RACM to capture emissions of fugitive dust and vent the emissions to a baghouse. The collection efficiency shall be

sufficient to minimize or eliminate visual emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- iii. P036 Condition II.A.2.c requires you to minimize or eliminate visible particulate emissions using RACM, including venting at least 85% of the emissions from this emission unit to the common baghouse.
- iv. Condition II.B.2. for P003, P034, P035, P041, P042, P036 and P027 requires that the pressure drop across the common baghouse be maintained within the range of 2 to 4 inches of water while any emissions unit vented to common baghouse is in operation.
- v. Condition II.C.2.a for P003, P034, P035, P041, P042, P036 and P027 requires the common baghouse monitoring system to constantly monitor the pressure differential across the baghouse and sound an audible alarm “when the pressure differential goes outside the range of 2 to 4 inches of water.”
- vi. Condition II.C.2. for P003, P034, P035, P041, P042, P036 and P027 requires you to record all periods of time when the pressure drop across the baghouse is outside the range of 2 to 4 inches of water.
- vii. F004 Condition II.C.2. requires you to perform weekly checks when F004 is in operation for any visible emissions of fugitive dust from any non-stack egress point serving F004. You must note the presence or absence of any visible particulate emissions in an operations log.
- viii. P003 Condition II.C.4. requires you to perform daily checks when P003 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving P003. You must note the presence or absence of any visible particulate emissions in an operations log.
- ix. P034 Condition II.C.4. requires you to perform daily checks when P034 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving P034. You must note the presence or absence of any visible particulate emissions in an operations log.
- x. P035 Condition II.C.4. requires you to perform daily checks when P035 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving P035. You must note the presence or absence of any visible particulate emissions in an operations log.
- xi. P041 Condition II.C.4. requires you to perform daily checks when P041 is in operation for any visible particulate emissions from the baghouse stack and any non-stack egress point (e.g., windows, doors, roof monitors, etc.)

serving these emission units; and 2) describes any corrective actions taken to eliminate the visible emissions.

- xx. P003 Condition 11.E.2. requires emission testing be conducted on P003 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxi. P034 Condition 11.E.2. requires emission testing be conducted on P034 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxii. P035 Condition 11.E.2. requires emission testing be conducted on P035 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxiii. P041 Condition 11.E.2. requires emission testing be conducted on P041 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxiv. P042 Condition 11.E.2. requires emission testing be conducted on P042 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxv. P036 Condition 11.E.2. requires emission testing be conducted on P036 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.
- xxvi. P027 Condition 11.E.2. requires emission testing be conducted on P027 within the 6 month-period prior to permit expiration. The PTO expired December 20, 2009.

3. The Foundry NESHAP rule relevant to this NOV/FOV is as follows:

- a. 40 C.F.R. § 63.10880 subjects a person to the Foundry NESHAP if he owns or operates an iron and steel foundry that is an area source of hazardous air pollutants.
- b. 40 C.F.R. § 63.10890(f) requires you to submit semiannual compliance reports to the Administrator according to the requirements in 40 C.F.R. § 63.10(e).

4. Based on an inspection and records review we conducted at the United Rolls facility on May 26-27, 2011, and a review of documents submitted to EPA and/or the OEPA, we have observed the following:

- a. P028 is vented to its own dust collector within the United Rolls facility. When P028 was loaded with molten metal and while P028 was spinning, emissions were not well-vented to the dust collector. The dust collector's pressure drop was zero inches of water on May 27, 2011; the dust collector was not operating.

- b. P901 is vented to its own dust collector within the United Rolls facility. When P901 was loaded with molten metal and while P901 was spinning, emissions were not well-vented to the dust collector. The dust collector's pressure drop was 5.8 inches of water on May 27, 2011.
 - c. P003, P034, P035, P041, and P042 are vented to a common baghouse, which is comprised of the east and west Torits.
 - d. On May 27, 2011, we observed significant emissions from tapping operations associated with P034. Visible emissions escaped and enveloped the hood that vents emissions to the common baghouse.
 - e. On May 27, 2011, we observed a significant portion of emissions from tapping operations associated with P041. Visible emissions escaped and enveloped the hood that vents emissions to the common baghouse.
 - f. On May 27, 2011, the emissions from P036 enveloped a large portion of the foundry building. The cloud of emissions then traveled north into the adjacent neighborhood.
 - g. On May 27, 2011 the pressure drop across the common baghouse was 7.6 inches of water at the east Torit baghouse and greater than 8.4 inches of water at the west Torit baghouse.
 - h. United Rolls does not have an audible alarm installed to indicate when the pressure differential goes outside the range of 2 to 4 inches of water at the common baghouse.
 - i. United Rolls does not keep pressure drop records for the common baghouse.
 - j. United Rolls does not document observations of visible emissions from egress points of a control device for any emission units.
 - k. In the semiannual report for the period of January 1 – June 30, 2011, United Rolls did not identify visible emissions observed escaping egress points, or pressure drops outside the allowable range for control devices.
 - l. United Rolls last performance tested all emission units in 2005.
5. Based on an inspection and records review we conducted at the United Rolls facility on May 26-27, 2011, a review of the documents submitted to EPA and/or OEPA, and the observations listed above, we have identified the following violations:
- a. Since October 1, 2006, you have failed to use RACM, including having a collection efficiency sufficient to minimize or eliminate visible particulate emissions at the point(s) of capture, in violation of PTO P0101182, P028 Condition 11.A.2.c and OAC 3745-17-08(B)(3).

- b. Since October 1, 2006, you have failed to use RACM, including having a collection efficiency sufficient to minimize or eliminate visible particulate emissions at the point(s) of capture, in violation of PTO P0101182, P901 Condition II.A.2.c and OAC 3745-17-08(B)(3).
- c. Since May 27, 2011, you failed to maintain pressure drop across the baghouse serving P028 within the range of 2 to 5 inches of water, in violation of PTO P0101182, P028 Condition II.B.1.
- d. Since May 27, 2011, you failed to maintain pressure drop across the baghouse serving P901 within the range of 2 to 5 inches of water, in violation of PTO P0101182, P901 Condition II.B.1.
- e. Since July 31, 2011, you have failed to identify in the quarterly pressure drop deviation (excursion) report at least one period of time when the pressure drop across the baghouse did not comply with the allowable pressure drop in violation of PTO P0101182, Condition II.D.1. for P028 and P901.
- f. The quarterly pressure drop deviation (excursion) report for the reporting period of April 1, 2011 – June 30, 2011 was due on July 31, 2011. You failed to submit the quarterly pressure drop deviation (excursion) report until August 9, 2011, in violation of PTO P0101182 Conditions II.D.1. and I.A.3.b for P028 and P901.
- g. Since December 20, 2009, you have failed to conduct emissions testing on P028 in violation of PTO P0101182, P028 Condition II.E.2.a.
- h. Since December 20, 2009, you have failed to conduct emissions testing on P901 in violation of PTO P0101182, P901 Condition II.E.2.a.
- i. Since October 1, 2006, you have failed to use RACM and vent at least 95% of the emissions from charging, melting, and tapping operations associated with P034 to the common baghouse, in violation of PTO P0101184, P034 Condition II.A.2.c and OAC 3745-17-08(B).
- j. Since October 1, 2006, you have failed to use RACM in order to maintain a collection efficiency at P041 sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design in violation of PTO P0101184, P041 Condition II.A.2.c. and OAC 3745-17-08(B).
- k. Since October 1, 2006, you have failed to vent at least 95% of the emissions from charging, melting, and tapping operations associated with P041 to the common baghouse, in violation of PTI 15-01337, P041 Condition II.A.2.d and OAC 3745-17-08(B).
- l. Since October 1, 2006, you have failed to use RACM and vent at least 85% of the emissions from P036 to the common baghouse in violation of PTO P0101184, P036 Condition II.A.2.c and OAC 3745-17-08(B).

- m. Since May 27, 2011, you have failed to maintain pressure drop across the common baghouse serving P003, P034, P035, P041, P042, P036 and P027 within the range of 2 to 4 inches of water while any emissions unit vented to this control device is in operation, in violation of PTI 15-01337, Condition II.B.2. for P041 and P042, and PTO P0101184, Condition II.B.2. for P003, P034, P035, P041 and P042.
- n. Since October 1, 2006, you have failed to use an audible alarm that sounds when the pressure differential goes outside the range of 2 to 4 inches of water, in violation of PTI 15-01337, Condition II.C.2.a for P041 and P042 and PTO P0101184, Condition II.C.2.a. for P003, P034, P035, P041, P042, P036 and P027.
- o. Since October 1, 2006, you have failed to record the pressure drop across the common baghouse on a daily basis, in violation of PTI 15-01337, Condition II.C.2. for P041 and P042.
- p. Since May 27, 2011, you have failed to record the pressure drop across the common baghouse when it was outside the range of 2 to 4 inches of water, in violation of PTO 0101184, Condition II.C.2. for P003, P034, P035, P041, P042, P036 and P027.
- q. Since October 1, 2006, you have failed to document weekly checks for any visible emissions of fugitive dust associated with F004, in violation of PTO P0101184, F004 Condition II.C.2.
- r. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P003 in an operations log in violation of PTO P0101184, P003 Condition II.C.4.
- s. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P034 in an operations log in violation of PTO P0101184, P034 Condition II.C.4.
- t. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P035 in an operations log in violation of PTO P0101184, P035 Condition II.C.4.
- u. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P041 in an operations log in violation of PTI 15-01337, P041 Condition II.C.4 and PTO P0101184, P041 Condition II.C.4.
- v. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P042 in an operations log in violation of PTI 15-01337, P042 Condition II.C.4 and PTO P0101184, P042 Condition II.C.4.

- w. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P036 in an operations log in violation of PTO P0101184, P036 Condition II.C.4.
- x. Since October 1, 2006, you have failed to note the presence or absence of any visible particulate emissions associated with P027 in an operations log in violation of PTO P0101184, P027 Condition II.C.3.
- y. Since July 31, 2011, you have failed to identify in your quarterly deviation report at least one period of time when the pressure drop across the baghouse did not comply with the allowable pressure drop in operation in violation of PTI 15-01337, Condition II.D.2. and I.A.2.b; PTO P0101184, Conditions II.D.1. and I.3.b for P003, P034, P035; and PTO P0101184, Condition II.D.2. for P041, P042, P036 and P027.
- z. Since July 31, 2011, you have failed to submit a semiannual report (for the reporting period of January 1 – June 30, 2011) that: 1) identifies all days during which any visible particulate emissions were observed from the baghouse and/or any non-stack egress point serving P034, P041 and P036; and 2) describes any corrective actions taken to eliminate the visible emissions. This is in violation of PTI 15-01337, P041 Condition II.D.4; PTO P0101184, Condition II.D.3. for P034; and PTO P0101184, Condition II.D.4. for P041 and P036.
- aa. Since December 20, 2009, you have failed to conduct emissions testing on P003, in violation of PTO P0101184, P003 Condition II.E.2.
- bb. Since December 20, 2009, you have failed to conduct emissions testing on P034, in violation of PTO P0101184, P034 Condition II.E.2.
- cc. Since December 20, 2009, you have failed to conduct emissions testing on P035, in violation of PTO P0101184, P035 Condition II.E.2.
- dd. Since December 20, 2009, you have failed to conduct emissions testing on P041, in violation of PTI 15-01337, P041 Condition II.E.3.a. and PTO P0101184, P041 Condition II.E.2.
- ee. Since December 20, 2009, you have failed to conduct emissions testing on P042, in violation of PTI 15-01337, P041 Condition II.E.3.a. and PTO P0101184, P042 Condition II.E.2.
- ff. Since December 20, 2009, you have failed to conduct emissions testing on P036, in violation of PTO P0101184, P036 Condition II.E.2.
- gg. Since December 20, 2009, you have failed to conduct emissions testing on P027, in violation of PTO P0101184, P027 Condition II.E.2.

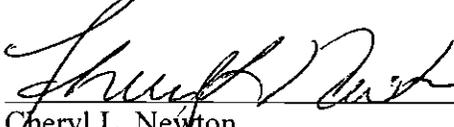
- hh. Since July 31, 2010, you have failed to submit the required semiannual compliance report for the reporting period of January 1 – June 30, 2011, in violation of §63.10890(f).

Environmental Impact of Violations

5. Violation of the particulate matter standards increases public exposure to unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths. Visible emission limits have long served to restrict particulate matter emissions.

9/29/11

Date



Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice and Finding of Violation, No. EPA-5-11-OH-18, by Certified Mail, Return Receipt Requested, to:

Gerry Hynes,
QA/EPA/ABS(CMU)
United Rolls Inc.
1400 Grace Avenue Northeast
Canton, Ohio 44705-2099

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

Ed Fasko, Manager Air Pollution Group
Ohio EPA, NEDO
2110 East Aurora Road
Twinsburg, Ohio 44087

And

Terri Dzienis, Interim APC Administrator
Canton City Health Department
Air Pollution Control Division
Ohio Environmental Protection Agency - Agency 15
420 Market Avenue, North
Canton, Ohio 44702-1544

On the 30th day of September 2011.



Betty Williams
Administrative Program Assistant
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7009168000076728102