

IN THE COURT OF COMMON PLEAS  
FRANKLIN COUNTY, OHIO

96CVH08-6602

STATE OF OHIO, ex rel.  
BETTY D. MONTGOMERY,  
ATTORNEY GENERAL OF OHIO  
30 East Broad Street  
Columbus, Ohio 43215-3428

CASE NO. \_\_\_\_\_

JUDGE \_\_\_\_\_

Plaintiff,

CONSENT ORDER

v.

BUCKEYE STEEL CASTINGS COMPANY  
2211 Parsons Avenue  
Columbus, Ohio 43207

Defendant.

FILED  
COMMON PLEAS COURT  
FRANKLIN CO., OHIO  
JESSE D. O'DONNELL  
CLERK OF COURTS  
96 AUG 30 PM 5:56

The Complaint in the above-captioned matter having been filed herein, and the Plaintiff State of Ohio by its Attorney General, Betty D. Montgomery, (hereinafter "Plaintiff") and Defendant Buckeye Steel Castings Company (hereinafter "Buckeye Steel Castings") having consented to the entry of this Order,

NOW THEREFORE, without trial of any issue of fact or law, and upon consent of the parties hereto, and without admission of fact or liability by Buckeye Steel Castings, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

I. DEFINITIONS

1. As used in this Order, the following terms are defined as follows:
  - a. "Air contaminant source", or "source", has the same meaning as that set forth in Ohio Rev. Code §3704.01(C) and Ohio Administrative Code Rules 3745-31-01(D) and 3745-35-01(B)(1).
  - b. "Consent Order", or "Order", means this Order and Final Judgment.
  - c. "Contractor" means the individual(s) or company or companies retained by or on behalf of the Defendant to undertake and complete the work required by this Consent Order. Each contractor and subcontractor shall be qualified to do those portions of the work for which it is retained.
  - d. "Facility" means Defendant Buckeye Steel Castings' steel castings facility located at 2211 Parsons Avenue, Columbus, Franklin County, Ohio.
  - e. "O.A.C." means the Ohio Administrative Code.

- f. "Ohio EPA" means the Ohio Environmental Protection Agency.
- g. "Permit to Install", or "PTI", has the same meaning as set forth in O.A.C. Chapter 3745-31.
- h. "Permit to Operate", or "PTO", has the same meaning as set forth in O.A.C. Chapter 3745-35.

## II. JURISDICTION AND VENUE

2. The Court has jurisdiction over the parties and the subject matter of this case. The Complaint states a claim upon which relief can be granted against Defendant under Chapter 3704 of the Ohio Revised Code, and venue is proper in this Court.

## III. PARTIES

3. The provisions of this Consent Order shall apply to and be binding upon the parties to this action, their agents, officers, employees, assigns, successors in interest and any person acting in concert or privity with any of them.

## IV. SATISFACTION OF LAWSUIT

4. Plaintiff alleges in its Complaint, *inter alia*, that Buckeye Steel Castings has operated spray painting operations ("Sources K001 - K003), a Mold Master Shakeout Punchout System ("Source P908"), storage piles ("Source F004"), woodworking operations ("Sources P039 - P040"), pouring areas ("Sources F007 - F009"), a Mold Master Casting System ("Source P906"), a mill sand reclamation system ("Source P904"), and a pit system (no source identification number established) at the Facility, without Permits to Operate such sources, in violation of the air pollution control laws and regulations of the State of Ohio. Plaintiff further alleges in its Complaint that Buckeye Steel Castings has installed several sources without Permits to Install such sources. In addition, Plaintiff alleges in its Complaint that Buckeye Steel Castings has violated emissions, control, reporting, testing, best available technology, and reasonably available control measure provisions of the air pollution control laws and regulations of the State of Ohio.

5. Buckeye Steel Castings denies the allegations in Plaintiff's Complaint.

6. Despite their differing views of the merits of the allegations in Plaintiff's Complaint, both parties desire to settle this case, and agree that compliance with the terms of this Consent Order shall constitute full satisfaction of any civil liability by Defendant for all violations alleged in the Complaint, and any violations alleged in Appendix A attached hereto. Nothing in this Order shall be construed to limit the authority of the State of Ohio to seek relief for violations not alleged in the Complaint or in Appendix A, including violations which occur after the entry of this Consent Order.

7. Chapters 3745-15, 3745-17, 3745-21, 3745-31, and 3745-35 of the Ohio Administrative Code have been approved by the United States Environmental Protection Agency, and are federally enforceable as part of the State of Ohio's State Implementation Plan ("SIP") under the Clean Air Act, 42 U.S.C. §7401 *et seq.* This Consent Order is the product of Plaintiff's diligent prosecution of the claims set forth in its Complaint under the State of Ohio's air pollution control laws and regulations, and it settles all such claims which are set forth in the Complaint and could be cognizable under the Clean Air Act, 42 U.S.C. §7401 *et seq.*

## V. INJUNCTION

### A. Compliance With Permits and Permitting Requirements

8. Buckeye Steel Castings agrees to refrain and is permanently enjoined from "installing" or "modifying" any "air contaminant source", as those terms are defined in O.A.C. Rules 3745-31-01(I), (J), and (C) at the Facility without first applying for and obtaining a Permit to Install from the Director of Ohio EPA in accordance with O.A.C. Rule 3745-31-02(A), unless the source is exempted from the requirement to obtain a Permit to Install by applicable state or federal statutes or regulations.

9. Buckeye Steel Castings agrees to refrain and is permanently enjoined from operating any air contaminant source, as that term is defined in O.A.C. Rule 3745-35-01(B)(1), at the Facility without first applying for and obtaining a Permit to Operate from Ohio EPA in accordance with O.A.C. Rule 3745-35-02(A) and O.A.C. Chapter 3745-77, unless the source is

exempted from the requirement to obtain a Permit to Operate by applicable state or federal statutes or regulations.

10. Buckeye Steel Castings agrees and is permanently and immediately enjoined and ordered to comply with all terms and conditions of all Permits to Install and Permits to Operate which are issued to it for air contaminant sources at the Facility.

**B. 80,000 Standard Cubic Feet Per Minute ("SCFM") Baghouse for 3-F Mill.**

11. Buckeye Steel Castings agrees and is hereby enjoined and ordered to design, construct, and thereafter operate an 80,000 scfm baghouse for its 3-F Mill in accordance with paragraphs 12 through 16 of this Order.

12. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 6, 1996, to complete the design of an 80,000 scfm baghouse for its 3-F Mill. The 80,000 scfm capacity of this baghouse shall be allocated such that: 35,000 scfm will serve to replace existing baghouse capacity; 45,000 scfm will serve to increase ventilation for the 3-F Mill area to reduce particulate emissions into the ambient air. The particulate emissions from the 80,000 scfm baghouse for the 3-F Mill shall not exceed an allowable emissions rate of 0.020 grain per dry standard cubic foot ("grain/dscf") of exhaust gases.

13. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by December 20, 1996, to order all necessary equipment for its installation of the 80,000 scfm baghouse for its 3-F Mill.

14. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by May 1, 1997, to commence installation and/or construction of the 80,000 scfm baghouse for its 3-F Mill.

15. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 8, 1997, to commence operation of the 80,000 scfm baghouse for its 3-F Mill. Within sixty (60) days of commencing operation of the 80,000 scfm baghouse, Buckeye Steel Castings shall perform particulate emission tests to demonstrate compliance with the 0.020 grain/dscf allowable emissions rate specified in paragraph 12 of this Order. No later than thirty (30) days

prior to such tests, Buckeye Steel Castings shall provide written notification of such tests to Ohio EPA, Central District Office, to afford Ohio EPA the opportunity to witness the tests. Within thirty (30) days after conducting the tests, Buckeye Steel Castings shall submit two (2) copies of the results to Ohio EPA.

16. In the event that a delay due to reasons beyond Buckeye Steel Castings' reasonable control, such as an unexpected work stoppage at its facility, prevents Buckeye Steel Castings from designing, installing, commencing operation, or testing the 80,000 scfm baghouse for its 3-F Mill by the dates specified in paragraphs 12 through 15 of this Order, Buckeye Steel Castings agrees and is hereby enjoined and ordered to comply with the provisions of paragraph 33 of this Order, and, by no later than September 1, 1998, to commence operation of the 80,000 scfm baghouse for its 3-F Mill.

C. Core Room Silo Baghouse.

17. Buckeye Steel Castings agrees and is hereby enjoined and ordered to design, construct, and thereafter operate a baghouse for its chromite sand silo, new sand silo, and reclaimed sand silo in accordance with paragraphs 18 through 22 of this Order.

18. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 6, 1996, to complete the design of a baghouse for its chromite sand silo, new sand silo, and reclaimed sand silo ("core room silo baghouse"). The particulate emissions from the core room silo baghouse shall not exceed an allowable emission rate of 0.020 grain per dry standard cubic foot ("grain/dscf") of exhaust gases.

19. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by October 18, 1996, to order all necessary equipment for its installation of the core room silo baghouse.

20. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by January 6, 1997, to commence installation and/or construction of the core room silo baghouse.

21. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by March 14, 1997, to commence operation of the core room silo baghouse. Within sixty (60) days of commencing operation of the core room silo baghouse, Buckeye Steel Castings shall perform

particulate emission tests to demonstrate compliance with the 0.020 grain/dscf allowable emission rate specified in paragraph 18 of this Order. No later than thirty (30) days prior to such tests, Buckeye Steel Castings shall provide written notification of such tests to Ohio EPA, Central District Office, to afford Ohio EPA the opportunity to witness the tests. Within thirty (30) days after conducting the tests, Buckeye Steel Castings shall submit two (2) copies of the results to Ohio EPA.

22. In the event that a delay due to reasons beyond Buckeye Steel Castings' reasonable control, such as an unexpected work stoppage at its facility, prevents Buckeye Steel Castings from designing, installing, commencing operation, or testing the core room silo baghouse by the dates specified in paragraphs 18 through 21 of this Order, Buckeye Steel Castings agrees and is hereby enjoined and ordered to comply with the provisions of paragraph 33 of this Order, and, by no later than June 1, 1997, to commence operation of the core room silo baghouse.

**D. Dry Filtration System for Source K002.**

23. Buckeye Steel Castings agrees and is hereby enjoined and ordered to design, construct, and thereafter operate a dry filtration system for Source K002 in accordance with paragraphs 24 through 28 of this Order.

24. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 6, 1996, to complete the design of a dry filtration system for Source K002.

25. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by September 16, 1996, to order all necessary equipment for its installation of the dry filtration system for Source K002.

26. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by December 2, 1996, to commence installation and/or construction of the dry filtration system for Source K002.

27. Buckeye Steel Castings agrees and is hereby enjoined and ordered, by December 31, 1996, to commence operation of the dry filtration system for Source K002.

28. In the event that a delay due to reasons beyond Buckeye Steel Castings' reasonable control, such as an unexpected work stoppage at its facility, prevents Buckeye Steel Castings from designing, installing, or commencing operation of the dry filtration system for Source K002 by the dates specified in paragraphs 24 through 27 of this Order, Buckeye Steel Castings agrees and is hereby enjoined and ordered to comply with the provisions of paragraph 33 of this Order, and, by no later than April 15, 1997, to commence operation of the dry filtration system for Source K002.

29. This Consent Order does not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing structures or facilities. Approval for any such construction or modification shall be by such permits as may be required by applicable federal, state, or local laws, rules or regulations.

E. Funding of Urban Area Tree Planting in Franklin County, Ohio.

30. Buckeye Steel Castings agrees and is hereby enjoined and ordered to pay Sixty-Five Thousand Dollars (\$65,000.00) to the Ohio Department of Natural Resources, Division of Forestry, Forestry Development Fund, for the purpose of funding urban area tree planting in Franklin County, Ohio. Such payment shall be made by delivering a certified check to Ann E. Egan, the Ohio Department of Natural Resources, Division of Forestry, Fund No. 4B8, Fountain Square, Columbus, Ohio 43224-1387, within thirty (30) days of the entry of this Order.

**VI. TERMINATION**

31. Not less than one (1) year after the date that Defendant Buckeye Steel Castings complies fully with paragraph 15 of this Order (or paragraph 16, if applicable), and so long as Buckeye Steel Castings has been in continuous compliance with the provisions of this Consent Order from the date of its entry, Buckeye Steel Castings may move, pursuant to Ohio R. Civ. P. 60(B), to terminate this Order in its entirety. Plaintiff takes no position at this time as to such motion, and reserves any rights it may have to oppose the motion.

## VII. CIVIL PENALTY

32. In settlement of Plaintiff's demand for civil penalties, Defendant Buckeye Steel Castings agrees to pay the amount of Five Hundred Eighty-Six Thousand, Seven Hundred Fifty Dollars (\$586,750.00). Of that amount, the payment of Three Hundred Eleven Thousand, Seven Hundred Fifty Dollars (\$311,750.00) is suspended upon the condition that Buckeye Steel Castings complies with the terms of paragraphs 11 through 30 of this Consent Order -- which paragraphs constitute supplemental environmental projects proposed by Buckeye Steel Castings in lieu of the payment of this portion of the civil penalty demanded by Plaintiff. Specifically, the payment of One Hundred Ninety-Three Thousand, Two Hundred Fifty Dollars (\$193,250.00) is suspended upon the condition that Buckeye Steel Castings complies with the terms of paragraphs 11 through 16 of this Consent Order, the payment of Forty Thousand Dollars (\$40,000.00) is suspended upon the condition that Buckeye Steel Castings complies with the terms of paragraphs 17 through 22 of this Consent Order, the payment of Thirteen Thousand, Five Hundred Dollars (\$13,500.00) is suspended upon the condition that Buckeye Steel Castings complies with the terms of paragraphs 23 through 28 of this Consent Order, and the payment of Sixty-Five Thousand Dollars (\$65,000.00) is suspended upon the condition that Buckeye Steel Castings complies with the terms of paragraph 30 of this Consent Order. The remaining portion of the penalty demanded by Plaintiff, in the amount of Two Hundred Seventy-Five Thousand Dollars (\$275,000.00), shall be paid by delivering a certified check to Matt Sanders, Administrative Assistant (or his successor), Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3428, payable to the order of "Treasurer, State of Ohio", within thirty (30) days of the entry of this Order.

## VIII. POTENTIAL FORCE MAJEURE

33. If any event occurs which causes or may cause a delay of any requirement of this Consent Order, Buckeye Steel Castings shall notify the Ohio EPA in writing within thirty (30) days after it becomes aware of the event, describing in detail the anticipated length of the delay, the precise cause or causes of the delay, the measures taken and to be taken by Buckeye Steel



Castings to prevent or minimize the delay and the timetable by which measures will be implemented. Buckeye Steel Castings will adopt all reasonable measures to avoid or minimize any such delay.

34. In any action by the Plaintiff to enforce any of the provisions of this Consent Order, Buckeye Steel Castings may raise that it is entitled to a defense that its conduct was caused by reasons entirely beyond its control such as, by way of example and not limitation, acts of God, strikes, acts of war or civil disturbances. While the Plaintiff does not agree that such a defense exists, it is, however, hereby agreed upon by Buckeye Steel Castings and the Plaintiff that it is premature at this time to raise and adjudicate the existence of such a defense and that the appropriate point at which to adjudicate the existence of such a defense is at the time that an enforcement action, if any, is commenced by the Plaintiff. At that time, Buckeye Steel Castings will bear the burden of proving any delay was or will be caused by circumstances entirely beyond the control of Buckeye Steel Castings. Unanticipated or increased costs associated with the implementation of any action required by this Consent Order, or changed financial circumstances, shall not constitute circumstances entirely beyond the control of Buckeye Steel Castings or serve as a basis for an extension of time under this Consent Order. Failure by Buckeye Steel Castings to comply with the notice requirements of this Section shall render this Section void and of no force and effect as to the particular incident involved and shall constitute a waiver of Buckeye Steel Castings' right to request an extension of its obligations under this Consent Order based on such incident. An extension of one compliance date based on a particular incident does not mean that Buckeye Steel Castings qualifies for an extension of a subsequent compliance date or dates. Buckeye Steel Castings must make an individual showing of proof regarding each incremental step or other requirement for which an extension is sought.

#### **IX. RETENTION OF JURISDICTION**

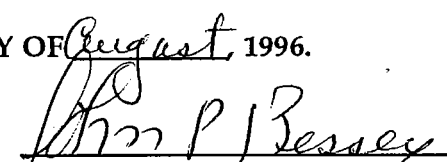
35. The court will retain jurisdiction of this action for the purpose of enforcing this Consent Order and resolving disputes arising under the Order.

X. COSTS

36. Defendant Buckeye Steel Castings is hereby ordered to pay the court costs of this action.

IT IS SO ORDERED:


ENTERED THIS 30<sup>th</sup> DAY OF August, 1996.

  
JUDGE, FRANKLIN COUNTY  
COURT OF COMMON PLEAS

APPROVED:

VORYS, SATER, SEYMOUR AND PEASE

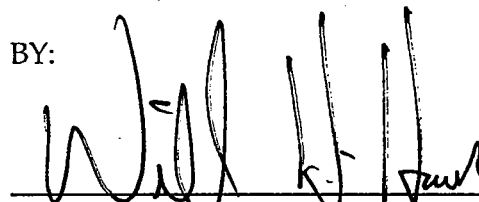
BY:

  
ANTHONY J. GUILIANI, ESQ. (0040969)  
PAUL J. COVAL, ESQ. (0022781)  
Vorys, Sater, Seymour and Pease  
52 East Gay Street  
Columbus, Ohio 43216-1008  
(614) 464-6400

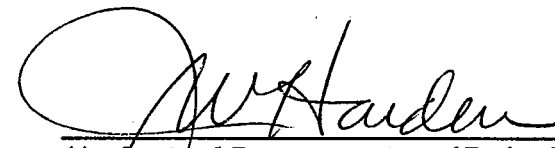
Counsel for Defendant

STATE OF OHIO, ex rel.  
BETTY D. MONTGOMERY  
ATTORNEY GENERAL OF OHIO

BY:

  
WILLIAM H. PAAK (0063952)  
Assistant Attorney General  
Environmental Enforcement Section  
30 East Broad Street, 25th Floor  
Columbus, Ohio 43215-3428  
(614) 466-2766

BY:

  
(Authorized Representative of Defendant, Buckeye Steel Castings Company)

TITLE:

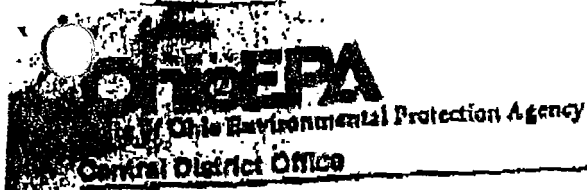
VP of GM

## APPENDIX A

IG-30 96 11:10 FROM:

TO: 6146443681

PAGE: 002



Local Address:  
2305 Westbrooke Drive, Building C  
Columbus, Ohio 43228  
614-771-7805 FAX 614-771-7571

Mailing Address:  
P.O. Box 2198  
Columbus, Ohio 43286-2198

George V. Volnovich  
Governor  
Donald R. Schrogardus  
Director

**CERTIFIED MAIL**  
**P 041 473 614**

October 21, 1994

Mr. Kim Myers  
Buckeye Steel Castings  
2211 Parsons Avenue  
Columbus, Ohio 43207

RE: Facility inspection conducted on August 16, 17, & 18 of 1994

Dear Mr. Myers:

Thank you for your cooperation and assistance during the Central District Office (CDO) annual inspection of the Buckeye Steel Casting (BSC) Parsons Avenue facility.

During the inspection CDO and DAPC staff observed that numerous sources are not being operated in accordance with the approved Preventative Maintenance and Malfunction Plan (PM&MP) approved on August 5, 1991. The following list identifies the sources with their respective emission control equipment that were observed not operating in accordance with the PM&MP.

| <u>Source</u>  | <u>Collector</u> | <u>Deficiency</u>   |
|----------------|------------------|---|
| P903           | B3296            | Unable to read monometer due to heavy black coating on monometer face |
| P904           | B2257            | Static pressure outside allowable range                               |
| P904           | B2261            | Static pressure outside allowable range                               |
| P033           | B3597            | Static pressure outside allowable range                               |
| P901/P902      | B3216            | Static pressure outside allowable range                               |
| P906/P093/P908 | B3700            | Static pressure outside allowable range                               |
| P905           | B3306            | Static pressure outside allowable range                               |
| P032           | B3334            | No ampmeter as required by the PM&MP                                  |
| P041           | B3656            | No ampmeter as required by the PM&MP                                  |
| P907           | B3657            | No ampmeter as required by the PM&MP                                  |
| P907           | B3657            | No ampmeter as required by the PM&MP                                  |
| P906           | B3639            | Static pressure outside allowable range                               |

UG-30 96 11:11 FROM:

TO: 6146443681

PAGE: 003

Mr. Kim Myers  
 RE: Buckeye Steel Castings  
 October 21, 1994  
 Page 2

| <u>Source</u> | <u>Collector</u> | <u>Deficiency</u>                       |
|---------------|------------------|---|
| P906          | B3640            | Static pressure outside allowable range |
| P011          | B3033            | No ampmeter as required by the PM&MP    |
| P011          | B3330            | No ampmeter as required by the PM&MP    |
| P012          | B3032            | Static pressure outside allowable range |

The aforementioned deficiencies constitute a violation of OAC rule 3745-15-06(D).

Additionally, CDO has determined that sources P011 and P905 are not operating in accordance with the terms and conditions of their respective Air Permit to Operate (PTO) because they are not being maintained in accordance with the PM&MAP. This constitutes a violation of ORC 3704.05(C).

A review of the records required by the PM&MAP revealed the following deficiencies:

| <u>Source</u> | <u>Collector</u> | <u>Deficiency</u>  |
|---------------|------------------|--|
| P905          | B3552            | 1. From 12/17/93 to 7/15/94 the "Ex For Amps" were not recorded.   |
|               |                  | 2. From 12/12/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.                                    |
| P905          | B3306            | 1. From 12/17/93 to 7/15/94 the "Ex For Amps" were not recorded.   |
|               |                  | 2. From 12/12/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.                                    |
| P011          | B3330            | 1. The records kept from 12/17/93 to 7/15/94 indicate that an amperage was recorded, however, the inspection revealed that there is no ampmeter. |
|               |                  | 2. From 1/7/94 to 7/1/94 the collector frequently did not operate in the acceptable static pressure range.                                       |
| P032          | B3334            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.                                    |

AUG-30 96 11:11 FROM:

TO:6146443681

PAGE:004

Mr. Kim Myers  
 RE: Buckeye Steel Castings  
 October 21, 1994  
 Page 3

| <u>Source</u> | <u>Collector</u> | <u>Deficiency</u>  |
|---------------|------------------|--|
|               |                  | 2. The records kept from 12/17/93 to 7/15/94 indicate that an amperage was recorded, however, the inspection revealed that this source does not have an ampmeter.  |
| P033          | B3597            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P906          | B3640            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.<br>2. On several records "Check Marks" were used where a response of "good, fair, or poor" or "yes or no" was requested. |
| P041          | B3656            | 1. From 2/4/94 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P907          | B3657            | 1. From 2/2/94 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P904          | B2257            | 1. From 12/17/93 to 6/24/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P904          | B2258            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P904          | B2261            | 1. From 12/17/93 to 7/8/94 the collector frequently did not operate in the acceptable static pressure range.   |
| P904          | B2410            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P029          | B3103            | 1. From 12/17/93 to 1/14/94 the collector frequently did not operate in the acceptable static pressure range.  |

Mr. Kim Myers  
 RE: Buckeye Steel Castings  
 October 21, 1994  
 Page 4

| <u>Source</u> | <u>Collector</u> | <u>Deficiency</u>   |
|---------------|------------------|---|
| P007          | B2700            | 1. From 1/29/94 to 5/20/94 the collector frequently did not operate in the acceptable static pressure range.  |
| P011          | B3033            | 1. From 12/17/93 to 7/15/94 the collector frequently did not operate in the acceptable static pressure range.   |
| P012          | B3032            | 1. Records reviewed from 12/17/93 to 7/15/94 indicate an amp reading was recorded, however, the inspection indicated an ammeter for this dust collector did not exist.<br>2. From 12/17/93 to 7/15/93 the collector frequently did not operate in the acceptable static pressure range. |
| P012          | B3032            | 1. Records reviewed from 12/17/93 to 7/15/94 indicate an amp reading was recorded, however, the inspection indicated an ammeter for this dust collector did not exist.<br>2. From 12/17/93 to 7/15/93 the collector frequently did not operate in the acceptable static pressure range. |

In consideration of the above-referenced deficiencies, CDO is requesting BSC provide the following:

1. A detailed explanation for each of the above referenced deficiencies. CDO is especially interested to know (for P011, P032, and P012) how an ammeter reading was being recorded when an ammeter is not installed to monitor this data.
2. A detailed plan which describes what actions BSC will take to address the aforementioned deficiencies for each source.
3. Dates by which ammeters will be installed on the dust collectors that are required to have such devices per the PM&MAP but, for which the facility currently has no instrument to conduct the required monitoring.

AUG-30 96 11:12 FROM:

TO: 6146443681

PAGE: 006

Mr. Kim Myers  
RE: Buckeye Steel Castings  
October 21, 1994  
Page 5

CDO requests a complete response to comments #1, #2, and #3 above  
by November 21, 1994.

If you have any questions, please don't hesitate to contact me at  
(614) 728-3813.

Sincerely,



Todd Scarborough  
Environmental Specialist  
Central District Office  
Division of Air Pollution Control

TS/bja

cc: Sara Lynn/Chris Korleski, AGO  
Jim Orlemann/Tammy Hilken, DAPC, CO  
Jay McCoy, DAPC, CDO



| Source #                | Collector # | Manometer Reading                             | Allowable Static Pressure Range (inches of H <sub>2</sub> O) | AMP Reading  | Maximum AMP Allowable          | Date of Observation |         |
|-------------------------|-------------|---|--|--------------|--------------------------------|---------------------|---------|
| P903                    | B3296       | Unreadable due to Black residue on gauge face |  |              |                                |                     | 8/16/94 |
| P904                    | B2257       | 6.5   | 1.0 - 4.0  | 25           | 26                             | 8/16/94             |         |
| P904                    | B2261       | .8  | 1.0 - 4.0  | 25           | 26                             | 8/16/94             |         |
| P904                    | B2258       | 1.2   | 1.0 - 4.0  | 28.5         | 26                             | 8/16/94             |         |
| P904                    | B2410       | 1.0   | 1.0 - 4.0  | 22           | 26                             | 8/16/94             |         |
| P033                    | B3597       | .6  | 4.0 - 6.0  | 47           | 64                             | 8/16/94             |         |
| P901/P902               | B3216       | 6.5   | 4 - 2.5  |              |                                | 8/16/94             |         |
| P903/P908/<br>P906/P009 | B3700       | 1) 3.5<br>2) 3.8<br>3) 4.6                    | 4) 4.0<br>5) 4.8<br>6) 2.5                                   | 3.0 - 5.0    | Fan 1) 173<br>2) 183<br>3) 180 | Unknown             | 8/16/94 |
| P905                    | B3552       | 4.5   | 4.0 - 6.0  | 45           | 55                             | 8/17/94             |         |
| P905                    | B3306       | 3.7   | 4.0 - 6.0  | 32           | 58                             | 8/17/94             |         |
| P030                    | B3122       | 2.5   | 1.0 - 4.0  | 11           | Unknown                        | 8/17/94             |         |
| P041                    | B3656       | 3.0   | 3.0 - 6.0  | No AMP meter | 147                            | 8/17/94             |         |
| P032                    | B3334       | 2.2   | 4.0 - 6.0  | No AMP meter | 60                             | 8/17/94             |         |
| P029                    | B3103       | 1.5   | 1.0 - 4.0  | 78           | Unknown                        | 8/17/94             |         |
| P907                    | B3657       | 10.0  | 3.0 - 6.0  | No AMP meter | 170                            | 8/17/94             |         |
| P906                    | B3639       | 7.5   | 4.0 - 6.0  | Unknown      | Unknown                        | 8/16/94             |         |
| P906                    | B3640       | 5.2   | 6.0 - 9.0  | Unknown      | Unknown                        | 8/16/94             |         |
| P007                    | B2700       | 2.4   | 1.0 - 4.0  | 30           | 51                             | 8/16/94             |         |
| P011                    | B3033       | 4.1   | 6.0 - 7.1  | No AMP meter | 65                             | 8/16/94             |         |
| P011                    | B3330       | 6.0   | 4.0 - 6.0  | No AMP meter | 58                             | 8/16/94             |         |
| P012                    | B3032       | 3.5   | 6.0 - 7.1  | 32           | Unknown                        | 8/16/94             |         |

UG-30 96 11:14 FROM:

TO: 6146443681

PAGE: 008  
Appendix M (cont.)

AGENCY REQUEST  
AI X  
AC \_\_\_\_\_  
MSPS \_\_\_\_\_  
NESHAPS \_\_\_\_\_  
#15 Ton/Yr \_\_\_\_\_  
Total # Sources 13

INSPECTION REPORT

Firm Name Buckeye Steel Castings Co. Telephone 614-444-2121  
Address 2211 Parsons Avenue City Columbus

Person Contacted Kim Myers Title Environmental Engineer  
Premise No. 0125040020 Date August 16, 1997

County Designation: TSP A SO2 A VOC A CO A NOx A  
(p = primary nonattainment; s = secondary nonattainment; a = attainment; u = unclassified)

Source No. P903 Source Description Large Room Sulfur

Control Equipment B3700 - Dust Collector  
Inspection Notes Unable to read magnetic gauge as a result of heavy deposit on face of gauge

Permit Status EXPIRED Additional Requirements: EAP (SIC) NSPS (No) NESHAPS (Not Known)  
Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-45-66 In Compliance: Yes  
VE (Attach readings) CEM and Data Checked: Yes

Photos Taken: (Yes) No (Attach) Other Evidence (attach) \_\_\_\_\_  
Basis for most recent compliance determination PM + MP - The permit requires direct PM + MP that sites services recorded. As a result of the heavy black deposit the magnetic gauge is not readable

Source No. P904 Source Description Flue Dust Reclamation System 3 F / NESHAPS System

Control Equipment B 2257, B 2261, B 2258, B 2410  
Inspection Notes B 2257 - Manometer read 6.5 inches when system running, 0.5 when not running; B 2261 - Manometer read 4.3 inches w/ system running; B 2258 - Manometer read 1.2 inches - (not running); B 2258 - Amp meter read 28.5 w/ system running; B 2410 - Manometer read 1.0 w/ system running

Permit Status EXPIRED Additional Requirements: EAP (SIC) NSPS (Yes) NESHAPS (No) NONE (N/A)  
Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-45-66 In Compliance: Yes  
VE (Attach readings) CEM and Data Checked: Yes

Photos Taken: (Yes) No (Attach) Other Evidence (attach) \_\_\_\_\_  
Basis for most recent compliance determination PM + MP - manometer readings indicate that all control equipment is not operating as required in the permit.

Source No. P033 Source Description Flue Dust Dust Collector

Control Equipment B 3597  
Inspection Notes Manometer read 4.6 inches w/ system running and amp meter read 47 amps

Permit Status A Additional Requirements: EAP (SIC) NSPS (Yes) NESHAPS (No) NONE (N/A)  
Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-45-66 In Compliance: Yes  
VE (Attach readings) CEM and Data Checked: Yes

Photos Taken: (Yes) No (Attach) Other Evidence (attach) \_\_\_\_\_  
Basis for most recent compliance determination PM + MP - manometer readings indicate that all control equipment is not operating as required by the permit.

Todd Leckband Permit Review Staff Signature  
Inspection Signature (if different than permit review staff)

AUG-30 96 11:14 FROM:

TO: 6146443681

PAGE: 009 of 4

Permit No. 1125640020 Date August 16, 1994

Source No. 901 and 902 Source Description #1 and #2 Burners

Control Equipment B-3216

Inspection Notes Static pressure out of range - Manometer read 6.5

Permit Status A Additional Requirements: EAP (STC) NSPS (C) NESHAPS (C) NONE

Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-15-06 In Compliance: Yes (C) Not Know: (N/A)

VE (Attach readings) CEM and Data Checked: Yes (C) No (N/A)

Photos Taken: Yes (No) (Attach) Other Evidence (attach)

Basis for most recent compliance determination PM + MP - Static pressure out of range - The permit requires that the PM+MP and the control equipment be operated within a specific operating range

Source No. P905, P908, P909, P90A Source Description Core Room hood system, cooking cooking + processing system

Control Equipment B3700

Inspection Notes Mod # 6 in out of range 2.5

Permit Status Expanded Additional Requirements: EAP (STC) NSPS (C) NESHAPS (C) NONE

Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-15-06 In Compliance: Yes (C) Not Know: (N/A)

VE (Attach readings) CEM and Data Checked: Yes (C) No (N/A)

Photos Taken: Yes (No) (Attach) Other Evidence (attach)

Basis for most recent compliance determination PM + MP - The permit requires that the PM+MP and the control equipment be operated within a certain static pressure

Source No. P905 Source Description SAF End Dry Sand Reclamation System

Control Equipment B3552 + B3306

Inspection Notes B3552 - Manometer read 4.5 inches + amp read 45 w/airflow monitoring  
B3306 - Manometer read 5.7 and amp read 32 w/airflow monitoring  
B3306 is running below range

Permit Status A Additional Requirements: EAP (STC) NSPS (C) NESHAPS (C) NONE

Regulation(s) 3745-17-07, 3745-17-11, 3745-15-06 In Compliance: Yes (C) Not Know: (N/A)

VE (Attach readings) CEM and Data Checked: Yes (C) No (N/A)

Photos Taken: Yes (No) (Attach) Other Evidence (attach)

Basis for most recent compliance determination PM + MP - The permit requires that the PM+MP and the control equipment operate within a certain static pressure range

Source No. P036 Source Description Uneslabrator Table Blast

Control Equipment A3122

Inspection Notes Manometer read 2.5 inches and amp meter read 11

Permit Status A Additional Requirements: EAP (STC) NSPS (C) NESHAPS (C) NONE

Regulation(s) 3745-17-07, 3745-17-08, 3745-17-11, 3745-15-06 In Compliance: Yes (C) Not Know: (N/A)

VE (Attach readings) CEM and Data Checked: Yes (C) No (N/A)

Photos Taken: Yes (No) (Attach) Other Evidence (attach)

Basis for most recent compliance determination PM + MP - The permit requires that the PM+MP and the control equipment be operated within a certain static pressure range

Table Blast  
Permit Review Staff Signature

Inspection Signature (if different than permit review staff)

AUG-30 96 11:15 FROM:

TO:6146443681

PAGE:010  
Page 5 of 6  
Appendix K (cont.)

Facility Status

NSPS  
 NESHAPS  
#25 Ton/Yr  
Total # Sources

INSPECTION REPORT

Firm Name Buckeye Steel Castings Company Telephone 614-444-2121  
Address 2211 Parsons Avenue City Chardon  
Person Contacted Kim Meyers Title Environmental Engineer  
Premises No. 025090020 Date August 16, 1994

County Designation: PM-10 as 802 e VOC e CO e NOx S  
(P = primary nonattainment; s = secondary nonattainment; a = attainment; u = unclassified)

Source No. P041 Source Description Coupler Turntables and Encoder

Control Equipment D3656  
Inspection Notes Manometer read 3.0 inches = 1/2 (X) amp meter

Permit Status A Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-02, 3745-17-03, 3745-17-11, 3745-15-06 In Compliance: Yes (NO) Not Known  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP - no amp meter as requested by  
PM+MP

Source No. P082 Source Description Isabel Blast Coupler Building

Control Equipment R3584  
Inspection Notes Manometer read 2.2 inches = 1/2 amp meter

Permit Status T Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-01, 3745-17-03, 3745-17-11, 3745-15-06 In Compliance: Yes (NO) Not Known  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP - no amp meter as requested  
by PM+MP; Manometer should be 14.0 to 6.0 amp

Source No. P029 Source Description #2 Foundry Room Blast

Control Equipment R3103  
Inspection Notes Manometer read 1.5 inches; amp meter read 78 amps

Permit Status T Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-01, 3745-17-03, 3745-17-11, 3745-15-06 In Compliance: Yes No Not Known  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP - static pressure range is  
1.0 inches to 4.0 inches; Amp range is 90 amps max

Frederick [Signature]  
Permit Review Staff Signature

[Signature]  
Inspection Signature (if different than permit review staff)

AUG-30 96 11:16 FROM:

TD:6146443681

PAGE:011

Page 4 of 4

Case No. 0125040020 Date

Source No. 1907 Source Description Chemical separation system

Control Equipment 4 3657

Inspection Notes Magnetics read 10 miles & Out of range (3.0-6.0) \* No amp meter

Permit Status 7 Additional Requirements: EAP STC NSPS NESHAPS NONE

Regulation(s) 3745-17-41, 3745-17-42, 3745-17-43, 3745-17-44 In Compliance: Yes No Not Known

VE (Attach readings) CEM and Data Checked: Yes No N/A

Photos Taken: Yes No (Attach) Other Evidence (attach)

Basis for most recent compliance determination PM10 - no amp meter no required by VM+MP & static pressure out of range

Source No. Source Description

Control Equipment

Inspection Notes

Permit Status Additional Requirements: EAP STC NSPS NESHAPS NONE

Regulation(s) In Compliance: Yes No Not Known

VE (Attach readings) CEM and Data Checked: Yes No N/A

Photos Taken: Yes No (Attach) Other Evidence (attach)

Basis for most recent compliance determination

Source No. Source Description

Control Equipment

Inspection Notes

Permit Status Additional Requirements: EAP STC NSPS NESHAPS NONE

Regulation(s) In Compliance: Yes No Not Known

VE (Attach readings) CEM and Data Checked: Yes No N/A

Photos Taken: Yes No (Attach) Other Evidence (attach)

Basis for most recent compliance determination

Source No. Source Description

Control Equipment

Inspection Notes

Permit Status Additional Requirements: EAP STC NSPS NESHAPS NONE

Regulation(s) In Compliance: Yes No Not Known

VE (Attach readings) CEM and Data Checked: Yes No N/A

Photos Taken: Yes No (Attach) Other Evidence (attach)

Basis for most recent compliance determination

Permit Review Staff Signature

Inspection Signature (if different than permit review staff)

AUG-30 96 11:16 FROM:

TO: 6146443681

PAGE: 012  
Appendix M (cont.)

AI X  
A2 \_\_\_\_\_  
N \_\_\_\_\_  
NESHAPS \_\_\_\_\_  
#25 Ton/Yr \_\_\_\_\_  
Total # Sources \_\_\_\_\_

INSPECTION REPORT

Firm Name Buckeye Hoop Castings Company Telephone 614 444 2121  
Address 2211 Parsons Avenue City Columbus

Person Contacted Kim Myer Title Environmental Engineer  
Premise No. 0125040026 Date August 13, 1997

County Designation: TSP a SO2 a VOC a CO a NOx a  
(p = primary nonattainment; s = secondary nonattainment; a = attainment; u = unclassified)

Source No. P906 Source Description Coating, Soling and Processing System

Control Equipment B3637 + B3640  
Inspection Notes B3637 Manometer read 7.5 mil, the allowable range is 4-6  
B3640 Manometer read 5.2 mil, the allowable range is 4-9

Permit Status Unknown Additional Requirements: EAP (STC) NSPS (No) NESHAPS (No) NONE (N/A)  
Regulation(s) 3745-17-01, 3745-17-02, 3745-17-11, 3745-15-06 In Compliance: Yes (No) Not Known (N/A)  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP - The permit requires 100% of the control equipment's static pressure to be maintained +/- 20% of design

Source No. P007 Source Description Solvent + Frame Monarch STABLAST

Control Equipment B2700  
Inspection Notes Manometer read 0.4 inches and Ammeter read 30 amps - both are within range

Permit Status EX-100 Additional Requirements: EAP (STC) NSPS (Yes) NESHAPS (No) NONE (N/A)  
Regulation(s) 3745-17-01, 3745-17-02, 3745-17-11, 3745-15-06 In Compliance: Yes (Yes) No (No) Not Known (N/A)  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP

Source No. P011 Source Description Wash Stand Washdown

Control Equipment B3033 - Wash Collector | B3330 - Dry Collector  
Inspection Notes B3033 - Magnetic - 4.5 mil when running and  
0 when not running - NO AMP READER  
B3330 - Magnetic was in 0 when not running - NO AMP READER

Permit Status A Additional Requirements: EAP (STC) NSPS (Yes) NESHAPS (No) NONE (N/A)  
Regulation(s) 3745-17-01, 3745-17-02, 3745-17-11, 3745-15-06 In Compliance: Yes (Yes) No (No) Not Known (N/A)  
VE (Attach readings) CEM and Data Checked: Yes No (N/A)  
Photos Taken: Yes (No) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM+MP - No amp meter as required

[Signature] Permit Review Staff Signature  
[Signature] Inspection signature (if different than permit review staff)

AUG-30 96 11:17 FROM:

TO: 6146443681

PAGE: 013  
Page 6 of 6

Permit No. 0125040020 Date \_\_\_\_\_

Source No. 1012 Source Description haul conditioning system

Control Equipment B3032  
Inspection Notes Manometer read 2.3 inches; Orp meter read 3.2 mV/OS

Permit Status Expired Additional Requirements: EAP STC NSPS MSHAPS NONE  
Regulation(s) 3745-07, 3745-17-08, 3745-17-11, 3745-17-12 In Compliance: Yes No Not Known  
VE \_\_\_\_\_ (Attach readings) CEM and Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination PM + MP - for the PM + MP the status  
pressure range allowable is 6" to 7.1"

Source No. \_\_\_\_\_ Source Description \_\_\_\_\_

Control Equipment \_\_\_\_\_  
Inspection Notes \_\_\_\_\_

Permit Status \_\_\_\_\_ Additional Requirements: EAP STC NSPS MSHAPS NONE  
Regulation(s) \_\_\_\_\_ In Compliance: Yes No Not Known  
VE \_\_\_\_\_ (Attach readings) CEM and Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination \_\_\_\_\_

Source No. \_\_\_\_\_ Source Description \_\_\_\_\_

Control Equipment \_\_\_\_\_  
Inspection Notes \_\_\_\_\_

Permit Status \_\_\_\_\_ Additional Requirements: EAP STC NSPS MSHAPS NONE  
Regulation(s) \_\_\_\_\_ In Compliance: Yes No Not Known  
VE \_\_\_\_\_ (Attach readings) CEM and Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination \_\_\_\_\_

Source No. \_\_\_\_\_ Source Description \_\_\_\_\_

Control Equipment \_\_\_\_\_  
Inspection Notes \_\_\_\_\_

Permit Status \_\_\_\_\_ Additional Requirements: EAP STC NSPS MSHAPS NONE  
Regulation(s) \_\_\_\_\_ In Compliance: Yes No Not Known  
VE \_\_\_\_\_ (Attach readings) CEM and Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination \_\_\_\_\_

[Signature]  
Permit Review staff Signature

[Signature]  
Inspection Signature (if different than permit review staff)

AUG-30 96 11:18 FROM:

TO: 6146443681

PAGE: 014



State of Ohio Environmental Protection Agency

Central District Office

## STREET ADDRESS:

3292 Alum Creek Drive  
Columbus, OH 43207-3417

TELE: (614) 728-3778 FAX: (614) 728-3684

## MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049**CERTIFIED MAIL - 0412**

February 28, 1996

Buckeye Steel Castings Co.  
Facility Inspection on  
January 24, 1996Mr. Kim Myers  
Environmental Engineer  
Buckeye Steel Castings Co.  
2211 Parsons Avenue  
Columbus, Ohio 43207

Dear Mr. Myers:

The Central District Office (CDO) appreciates your cooperation during the facility inspection of January 24, 1996. An inspection report is enclosed for your information.

During the inspection, pressure drop across the fabric filters and amperage on fans serving pollution control devices were checked against ranges in the PM&MAP. In addition, data sheets for daily inspection of these devices were reviewed. In two instances, elevated pressure drops above the normal operating ranges were observed for baghouses B2258 and B2700. After rapping, pressure losses returned to normal ranges in other baghouses and visible emissions were not observed as a result of the elevated readings.

CDO reviewed quarterly reports and verified that the annual cumulative operating hours of moldmaster casting system (P906) did not exceed 6,000 hours between October 1994 and September 1995. CDO forwarded a recommendation to Central Office that PTI 01-2520 be modified with a fabric filter performance requirement of 0.02 grains particulate matter per dry standard cubic feet of air flow from the two baghouses superseding 99% control efficiency of emissions from the moldmaster casting system. CDO requests emission testing be scheduled after the modified PTI is issued to verify compliance with the standard.

CDO agrees that the moldmaster sand system (P009) and mold shakeout (P908) processes that both vent to the B-3700 baghouse are integrated allowing them to be combined under one source number. CDO received the revised appendix M8 with mold shakeout identified under emission unit number P009 and a process weight rate of 320 tons per hour. The expired permit to operate specified an emission test for the moldmaster sand system prior to renewal. CDO requests that Buckeye Steel schedule an emission test to demonstrate compliance with the standard of 0.02 grains per dry standard cubic feet.



AUG-30 96 11:18 FROM:

Mr. Kim Myers  
Environmental Engineer  
February 28, 1996  
Page Two

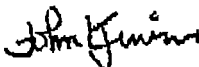
CDO reviewed quarterly reports for monthly hours of operation of the three air carbon arc turntables and verified that the 333 operating hours restriction was not exceeded for source P044 between October 1994 and September 1995.

Regarding renewal of permits to operate for which applications had been submitted, CDO is unable to renew these applications prior to the Title V application deadline. CDO did not process the renewal application for the East End Sand Reclamation System (P905) received on November 23, 1995. CDO does not expect that nonrenewed permits for emission units in compliance will delay processing the Title V application.

CDO intends to permit the pep set core making under the core sand system source ID# P903. CDO will include provisional use of an emission factor of 0.0008 lbs OC per ton of sand in core making. CDO intends to forward a recommendation before March to Central Office for approval of the pep set core making process.

If you have any questions regarding this letter, you may contact me at (614) 728-3812.

Sincerely,



John Kirwin  
Environmental Specialist II  
Division of Air Pollution Control  
Central District Office

Enclosure

cc. Jay McCoy, CDO DAPC  
Jim Orlemann, DAPC, CO  
Tammy Hilkins, DAPC, CO

AUG-30 96 11:19 FROM:

TO: 6146443681

PAGE: 016

Appendix M (cont.)

STATUS

WEAPONS

#25 Ton/Yr 13

total # Sources 89

INSPECTION REPORT

Plant Name BUKENE STEEL CASTINGS CO. Telephone 614-444-2121  
 Address 2211 PARSONS AVE. City COLUMBUS  
 Person Contacted KIM MEYERS Title ENVIRONMENTAL ENGINEER  
 Permit No. 0125 CAG 0020 Date 01/24/96

County Designation: TSP A SO2 A VOC A CO A NOx A  
 (A = primary nonattainment; S = secondary nonattainment; A = attainment; U = unclassified)

Source No. E004 Source Description SAG HANDLING & STORAGE PILES PERM AREA # 3

Control Equipment NETTING PERIODICALLY TO REDUCE FUGITIVE EMISSIONS.  
 Inspection Notes DID NOT OBSERVE IN OPERATION. MAY BE VISIBLE FROM ER104 DURING AFTERNOONS WHEN CLAM SHELL IS USED TO OFFLOAD SAG FOR COOLING. SOME VISIBLE EMISSIONS WERE OBSERVED FROM STEAM.

Permit Status A Additional Requirements: EAP STC NESHAPS NONE  
 Regulation(s) 3745-17-07, 3745-17-08 In Compliance: YES No NO Not Known  
 E NONE TAKEN, RHINING (Attach readings) CSM and Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination APPLICATION OF JANUARY 23, 1995, PERIODIC REVIEW BY EPA

Source No. E007 Source Description HOT METAL POURING OPERATION - LANS MOLDING  
PERM AREA #9 (PERM AREA #7)

Control Equipment NONE  
 Inspection Notes OBSERVED INSIDE BUILDING

Permit Status A Additional Requirements: EAP STC NESHAPS NONE  
 Regulation(s) 3745-17-07, 3745-17-08 In Compliance: YES No NO Not Known  
 E NONE TAKEN (Attach readings) CSM and Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination OBSERVATION

Source No. E008 Source Description HOT METAL POURING OPERATION - 2600 POURS/MIN  
PERM AREA

Control Equipment NONE  
 Inspection Notes DID NOT OBSERVE POURING IN FRONT AREA, NO VISIBLE

Permit Status A Additional Requirements: EAP STC NESHAPS NONE  
 Regulation(s) 3745-17-07, 3745-17-08 In Compliance: YES No NO Not Known  
 E NONE TAKEN (Attach readings) CSM and Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination OBSERVATION

Permit Review Staff Signature

John Keenan  
 Inspection Signature (if different than permit review staff)

NO. 01 03 04 0020

Date 01/24/96

Source No. P009 Source Description MANUAL SPRAY PAINTING - ROOSTER FRAME  
 Control Equipment NONE  
 Inspection Notes NONE

Permit Status EXPIRED Additional Requirements: EAP STC NSPS NESHAPS NONE  
 Regulation(s) 3745-17-07, 3745-17-08 In Compliance: Yes No Not Known  
 (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: NONE

Source No. K001 Source Description MANUAL SPRAY PAINTING - ROOSTER FRAME  
 Control Equipment NONE - CONTAINMENT RESTRICTION OF 3.5 LBS VOLT/GALLON  
 Inspection Notes OBSERVED

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
 Regulation(s) 21-09 (U) (I) (A) (L) In Compliance: Yes No Not Known  
 (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: APPLICATION DATA

Source No. K002 Source Description MANUAL FINISHING SPRAY PAINT BOOTH  
 Control Equipment MANUAL CURTAIN FOR DM  
 Inspection Notes OBSERVED; NOT IN USE

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
 Regulation(s) 21-09 (U) (I) (A) (L) In Compliance: Yes No Not Known  
 (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: APPLICATION DATA

Source No. P007 Source Description MANUAL SHOT BOLT W/ BRASS  
 Control Equipment B2700 BACHHOUSE  
 Inspection Notes MANUAL READING INSTEAD OF PERM. AT 7.2 INCHES WATER EMISSION  
ST. OF MAY 25, 1995 MEAS 0.02 GRAMS/DSCF. RENEWAL RECOMMENDED 9/21/95

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
 Regulation(s) 3745-17-07-08-11 In Compliance: Yes No Not Known  
 (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: EMISSION TEST OF MAY 25, 1995

Permit Review Staff Signature \_\_\_\_\_ Inspector Signature (if different than permit review staff) \_\_\_\_\_

AUG-30 96 11:20 FROM:

TD: 6146443681

PAGE: 018

Page 3

Premise No. 0125 04 0020

Date 1/24/96

Source No. 1009 Source Description SAND MILL & CONVEYORS W/ FABRIC FILTER  
 CONTROL EQUIPMENT W/OLD MANTAL- SAND SYSTEM  
 Control Equipment WAREHOUSE B3700  
 Inspection Notes SIX MANOMETER READINGS AND THREE AMPERAGE READINGS MADE WITHIN RANGE. WITHIN 3"-6" WATER PRESSURE DIFFERENTIAL. BUCKLE STEEL REQUERED FOR THIS SOURCE IN COMPLIANCE WITH 1908 (WATER IS CURRENTLY WITHIN A PERMIT TO OPERATE)  
 Permit Status A Additional Requirements: EAP STC NPSS NESHAPS NONE  
 Regulation(s) 17-11 (TABLE 1) In Compliance: Yes NO Not Known  
 VE NONE (RAINING) (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: ANOMALOUS READINGS AT B3700

Source No. 1011 Source Description WEST END SAND SYSTEM W/ SCRAPER AND  
 CONTROL EQUIPMENT WAREHOUSE (2) BIN VENTS  
 Control Equipment WAREHOUSE B3023  
 Inspection Notes 2.7 INCHES WATER PRESSURE DROP ACROSS FABRIC FILTER  
 Permit Status A Additional Requirements: EAP STC NPSS NESHAPS NONE  
 Regulation(s) 3745-17-11 (TABLE II) In Compliance: Yes NO Not Known  
 VE NONE (RAINING) (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: EMISSION TEST 10/95 REVIUING 7/95

Source No. 1012 Source Description SIMPSON'S MILL AND CONVEYORS W/ WET SCRAPER  
 CONTROL EQUIPMENT WAREHOUSE B3032  
 Inspection Notes 4.2 INCHES WATER WITHIN RANGE FOR PRESSURE DROP ACROSS FABRIC FILTER. OPEN WITH TERMS AND CONDITIONS FURNISHED TO CENTRAL OFFICE BUT NOT PROCESSED. WILL SUBMIT TITLE V  
 Permit Status A Additional Requirements: EAP STC NPSS NESHAPS NONE  
 Regulation(s) 3745-17-11, 17-02, 17-07 In Compliance: Yes NO Not Known  
 VE NONE (RAINING) (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: STACK TEST 5/95; TESTED AT 42 INCHES

Source No. 1090 Source Description TABLE SHEET EAST W/ FABRIC FILTER  
 CONTROL EQUIPMENT WAREHOUSE B-3123  
 Inspection Notes 2.2 INCHES WATER ON MANOMETER  
 Permit Status A Additional Requirements: EAP STC NPSS NESHAPS NONE  
 Regulation(s) 3745-17-07, 17-11 (TABLE I) In Compliance: Yes NO Not Known  
 VE NONE (Attach readings) CEM & Data Checked: Yes NO N/A  
 Photos Taken: Yes NO (Attach) Other Evidence (attach)  
 Basis for most recent compliance determination: NO WHOLE EMISSIONS.

Permit Review Staff Signature

Alan Kemlin  
 Inspector Signature (if different than permit review staff)

AUG-30 96 11:21 FROM:

TO: 6146443681

PAGE: 019

Page 4 of 5

Source No. 0125 OF 0020 Date 1/24/96  
Source Description SAND DRYER SYSTEM W/ FABRIC FILTER

Control Equipment B-32597 BACHUSE  
Inspection Notes DOWN - PERMIT DENIED WITH RENEWAL SENT TO CENTER OFFICE ON AUGUST 16, 1996

Permit Status A Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: (Yes) No Not Known  
VE NONE (Attach readings) CEM & Data Checked: Yes No (N/A)  
Photos Taken: Yes (NO) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: CALCULATIONS FROM PFD RENEWAL

Source No. P044 Source Description THREE AIR CARBON AIR PURIFIERS AND BOOTH

Control Equipment BACHOUSE B-3456  
Inspection Notes 5.6 INCHES WATER ON MANOMETER WITHIN ALLOWABLE RANGE  
333 hrs operation/month construction 1/194, 3/95, 6/95, 9/95

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: Yes No Not Known  
READING (ANNING) (Attach readings) CEM & Data Checked: YES No N/A  
Photos Taken: Yes (NO) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: VISUAL INSPECTION QUARTERLY READINGS FOR OPERATION HORNS FOR MONTH

Source No. P901, P902 Source Description NO. 1 BATTLE AIR FURNACE, NO. 2 BATTLE AIR

Control Equipment BACHOUSE B-32110  
Inspection Notes NO. 2 AIR FURNACE DOWN NO. 1 OPERATING WITH NO VISIBLE EMISSIONS FROM  
DOWN OR EXHAUSTOR - MANOMETER READINGS ON BACHOUSE WERE WITHIN RANGE -  
NO. 1 RECOMMENDED A ON 8/16/95, NO. 2 RECOMMENDED A ON 8/16/95

Permit Status A Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: (Yes) No Not Known  
VE NONE (Attach readings) CEM & Data Checked: YES No N/A  
Photos Taken: Yes (NO) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: VISUAL INSPECTION

Source No. P903 Source Description COLE ROOM SAND SYSTEM W/ BACHOUSE

Control Equipment BACHOUSE B-3296 FOR COLE SILD BY VENT BACHOUSE B-3100 FOR COLE ROOM  
Inspection Notes MANOMETER READINGS WITHIN ACCEPTABLE RANGE FOR BACHOUSE B-3296  
RENEWAL SUBMITTED BUT NOT RECOMMENDED FOR RENEWAL DUE TO PERMIT PROCESS

Permit Status A Additional Requirements: EAP (STC) NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: (Yes) No Not Known  
VE NONE (Attach readings) CEM & Data Checked: Yes No N/A  
Photos Taken: Yes (NO) (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: VISUAL INSPECTION

Permit Review Staff-Signature

Jim K...  
Inspector signature (if different than permit review staff)

AUG-30 96 11:22 FROM:

TO: 6146443681

PAGE: 020

Premise No. 0125 04 0020

Date 1/24/96

Source No. P905 Source Description EAST END DEL SAND RECLAIMATION SYSTEM W/

Control Equipment BAEHOUSE B-3506 FOR SAND UNLOADER, B-3552 FOR SAND COLLECTION  
Inspection Notes MANO MEDIA READINGS WITHIN RANGE DURING INSPECTION. PERMIT EXPIRES 11/95 AND IT RECENTLY RECEIVED 11/20/95.

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: Yes No Not Known  
VE NONE (RAIMON) (Attach readings) CEM & Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: INSPECTION

Source No. P904 Source Description SAND RECLAIMATION SYSTEM (W/ POUNDY)

Control Equipment BAEHOUSE B2257 FOR #3 SAND RECLAIM, B2258 FOR #2 SAND RECLAIM  
Inspection Notes B 2261 FOR #2 SAND RECLAIM, B 2262 FOR #1 SAND RECLAIM SYSTEM. PERMITS NOT RENEWED BECAUSE COMPLIANCE NOT DEMONSTRATED. KIP INDICATED THAT BUCKEYE STEEL INTENDS TO REPAIR FOR A GREAT PROJECT. MANO MEDIA READINGS WITHIN RANGE.

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
Regulation(s) 3745-17-11 (PART) In Compliance: Yes No Not Known  
VE NONE (Attach readings) CEM & Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination:

Source No. P906 Source Description HOUSEHOLD WASTE CRUSHING SYSTEM

Control Equipment BAEHOUSE B3639 AND B3640  
Inspection Notes UNABLE TO DEMONSTRATE COMPLIANCE WHEN TESTED ON JUNE 11, 1991. BUCKEYE STEEL REQUESTED MODIFICATION FROM 99% CONTROL EFFICIENCY TO 0.02 GYDSCF AT OUTLET. RECOMMENDED MODIFICATION ON 2/10/92. NEED TO CONDUCT AN EMISSION TEST ON B-3639

Permit Status A Additional Requirements: EAP STC NSPS NESHAPS NONE  
Regulation(s) 3745-17-07, 17-08, 17-11 In Compliance: Yes No Not Known  
VE NONE (Attach readings) CEM & Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: STACK TEST ON 6/11/91, QUARTERLY COMPLIANCE REPORTS FOR 6,000 HOURS OPERATION PER YEAR.

Source No. P907 Source Description HOUSEHOLD WASTE PUNCHON / SHAKEDOT AREA

Control Equipment BAEHOUSE B-3700  
Inspection Notes SEE P904 MANO MEDIA READINGS OKAY; NEW BAEHOUSE INSTALLED JULY 1993. BUCKEYE STEEL AGREED TO SUBMIT A REVISED APPENDIX M-8 THAT INCLUDES SHAKEDOT UNDER P904. P907 ORIGINALLY CREATED 11/2/91 WITHOUT PRT ISSUANCE.

Permit Status NOT ISSUED Additional Requirements: EAP STC NSPS NESHAPS NONE  
Regulation(s) 3745-17-08, 17-11 In Compliance: Yes No Not Known  
VE NONE (Attach readings) CEM & Data Checked: Yes No N/A  
Photos Taken: Yes No (Attach) Other Evidence (attach)  
Basis for most recent compliance determination: NO VISIBLE EMISSIONS AND MANO MEDIA READINGS OKAY.

Permit Review Staff Signature

X- [Signature]  
Inspector Signature (if different than permit review staff)

STEEL CASTINGS 01/24/96

| Source           | Source # | Collector # | Man. In. | Range In. | Fan Amp | Fan Range | Date    |
|------------------|----------|-------------|----------|-----------|---------|-----------|---------|
| CoreSiloBinVent  | P903     | B3296       |          | 0.5-6.0   |         |           |         |
| #3Sand Reclaim   | P904     | B2267       | 0.9      | 0.5-6.0   | 28      | 32 max    | 1/24/96 |
| 3FSand System    | P904     | B2261       | 2.2      | 0.5-6.0   | 23      | 32 max    | 1/24/96 |
| #2Sand Reclaim   | P904     | B2268       | 7.8      | 0.5-6.0   | 20      | 32 max    | 1/24/96 |
| #1Sand Reclaim   | P904     | B2410       | 0.6      | 0.5-6.0   | 22      | 32 max    | 1/24/96 |
| Sand Dryer       | P033     | B3697       | down     | 2.0-8.0   |         | 66 max    | 1/24/96 |
| #1 Arc Furnace   | P901     | B3216       | 3.2-4.1  | 2.0-8.0   | 330,210 | 460,270   | 1/24/96 |
| #2 Arc Furnace   | P902     | B3216       | down     |           | 220     | 270       | 1/24/96 |
| Core Room        | P903     | B3700       | 3.7,4.5  | 2.0-10.0  | 158     | 240       | 1/24/96 |
| Casting Shakeout | P906     | B3700       | 4.8,4.1  | 2.0-10.0  | 185     | 240       | 1/24/96 |
| Mold Master      | P009     | B3700       | 3.5,3.3  | 2.0-10.0  | 162     | 240       | 1/24/96 |
|                  | P908     | B3700       |          | 2.0-10.0  |         |           | 1/24/96 |
| Sand Crusher     | P905     | B3306       | 6.8      | 2.0-8.0   | 43.6    | 55        | 1/24/96 |
| Sand Collector   | P905     | B3552       | 4.7      | 2.0-8.0   | 51      | 55        | 1/24/96 |
| Table Shot Blast | P030     | B3122       | 2.2      | 1.0-8.0   | 12.4    | 15        | 1/24/96 |
| 3 Arc Air Booths | P041     | B3658       | 5.6      | 2.0-10.0  | 115     | 147       | 1/24/96 |
| Tumbleblast      | P032     | B3334       | 3.2      | 2.0-8.0   | 32      | 66        | 1/24/96 |
| #2FoundryBlast   | P029     | B3103       | 2.6      | 1.0-8.0   | 80      | 90        | 1/24/96 |
| Chromite/Sand    | P907     | B3657       | 6.3      | 2.0-10.0  | 74      | 170       | 1/24/96 |
| Pit Finishing    | P906     | B3639       | 9.5      | 2.0-10.0  |         | 283       | 1/24/96 |
| Pit Finishing    | P906     | B3640       | 4.2      | 2.0-10.0  |         | 147       | 1/24/96 |
| Monorail Blast   | P007     | B2700       | 7.2      | 1.0-6.0   | 50      | 61        | 1/24/96 |
| WetSand/BinVent  | P011     | B3033       | 2.7      | 1.0-7.0   |         | 55        | 1/24/96 |
| WestEndSand      | P011     | B3330       | 6.2      | 2.0-8.0   |         | 58        | 1/24/96 |
| #3MillWetCollect | P012     | B3032       | 4.2      | 1.0-7.0   | 38      | 55        | 1/24/96 |

W