COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

December 21, 2000

TO: WM. DEBOISBLANC, DIRECTOR, PERMIT SERVICES

FROM: JIM GUTHRIE, DIRECTOR OF ENFORCEMENT

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

AMERICAN BRASS & IRON FOUNDRY (AB&I)

In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

American Brass & Iron Foundry

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

Background

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record to review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for AB&I for the period January 1, 2000 to December 20, 2000. This review was initiated as part of the District evaluation of an application by AB&I for a Title V Permit. During this review period, AB&I activities known to the District include:

One Notice of Violation was issued.

Fourteen alleged complaints of smoke, odor, and fallout, of which one was confirmed.

No monitor excesses or equipment breakdowns were reported or documented by District Staff.

AB&I is not under a District variance or an Order of Abatement.

District staff and AB&I personnel met for a site visit on June 8, 2000. During this meeting staff and AB&I personnel were able to discuss minimizing future smoke, odor, and fallout complaints. The personnel at AB&I demonstrated to District staff the ongoing improvements the plant was working on to address the complaint issues. AB&I has installed new baghouses, with District staffs permission, that are more efficient at handling their emissions. The complaints received by the District alleging AB&I have dropped off significantly in the last six months.

Conclusions

The Director of Enforcement finds that on-going compliance can be reasonably assured for this facility, for the review period, due to one Notices of Violation issued and no monitor excesses or breakdowns recorded.

Recommendations

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

TG:ljc

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