



REGION 5

CHICAGO, IL 60604

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Eric Buckley, Office Manager
Spectrum Machine, Inc.
ebuckley@spectrummachine.com

Re: Finding of Violation
Spectrum Machine, Inc.
Ravenna, Ohio

Dear Eric Buckley:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Spectrum Machine, Inc. ("Spectrum Machine" or "you") under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a). We find that you are violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart TTTTTT for Secondary Nonferrous Metals Processing Area Sources and the Facility's Permit to Install and Operate (PTIO) at your Ravenna, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

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

The EPA contacts in this matter are Gunnar Brown and Jacob Herbers. You may email Gunnar Brown at Brown.Gunnar@epa.gov and Jacob Herbers at Herbers.Jacob@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

For legal questions, please contact Sarah Baehr, Associate Regional Counsel, at Baehr.Sarah@epa.gov.

Sincerely,

Sarah Marshall
Supervisor,
Air Enforcement and Compliance Assurance Section MI/WI

cc: Joshua Koch, Manager
Division of Air Pollution Control
Ohio Environmental Protection Agency
Joshua.Koch@epa.ohio.gov

Sam Rubens, Air Administrator
Akron Regional Air Quality Management District
Ohio Environmental Protection Agency
srubens@schd.org

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:	)	
	)	
Spectrum Machine, Inc.	)	FINDING OF VIOLATION
Ravenna, Ohio	)	
	)	EPA-5-25-OH-02
Proceedings Pursuant to	)	
the Clean Air Act,	)	
42 U.S.C. §§ 7401 et seq.	)	

FINDING OF VIOLATION

The U.S. Environmental Protection Agency finds that Spectrum Machine is violating Section 112 of the Clean Air Act, 42 U.S.C. § 7412. Specifically, Spectrum Machine is violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources at 40 C.F.R. Part 63, Subpart TTTTTT and the Facility's Permit to Install and Operate (PTIO) at its Ravenna, Ohio facility (the Facility), as follows:

Regulatory Authority

NESHAP Subpart TTTTTT

1. The NESHAP for Secondary Nonferrous Metals Processing Area Sources at 40 C.F.R. Part 63, Subpart TTTTTT applies to brass and bronze casting foundries.
2. 40 C.F.R. § 63.11463(d), provides that an affected source is new if you commenced construction or reconstruction of the affected source after September 20, 2007.
3. 40 C.F.R. § 63.11464(b)(2), provides that if you start up your affected source after December 26, 2007, you must comply with this subpart upon initial startup of your affected source.
4. 40 C.F.R. § 63.11466(a), provides that if you own or operate a new affected source, you must conduct a performance test for each affected source within 180 days of your compliance date and report the results in your notification of compliance status.
5. 40 C.F.R. § 63.11466(c), provides requirements for conducting performance testing.
6. 40 C.F.R. § 63.11468(c), provides, in part, that for each new affected source as defined in 40 C.F.R. § 63.11463(d), you must install, operate, and maintain a bag leak detection system (BLDS).

Permit to Install and Operate (PTIO)

7. On July 11, 2011, the Ohio Environmental Protection Agency (OEPA) issued PTIO # P0108349 to Spectrum Machine, Inc. – Plant 2.
8. On September 02, 2021, the OEPA issued PTIO # P0130596 to Spectrum Machine, Inc. – Plant 2.
9. Permit Condition B. 2., states, in part, that “this facility operates affected sources that are subject to the requirements of 40 C.F.R. Part 63, Subpart TTTTTT... The following affected sources are subject to the area source requirements of this NESHAP standard: emissions units P002, P003, P004.”
10. Permit Conditions C. 1. f) (1) and C. 2. f) (1) each provide that compliance with the Facility’s particulate [matter] emission (PM or PE) limits shall be determined in accordance with specified testing requirements.

Factual Background

Facility Background

11. Spectrum Machine owns and operates a bronze metals casting foundry at 7071 Peck Road, Ravenna, Ohio 44266 that was constructed in 2011, and started up in 2011 or 2012, according to Facility staff.

The EPA Inspection

12. The EPA conducted an unannounced CAA inspection of the Facility on July 17, 2024 (July 2024 Inspection).
13. During the July 2024 Inspection, no BLDS was observed for the affected emissions units.
14. The Facility’s PTIO does not mention a BLDS.
15. During the July 2024 Inspection, documents were requested from Spectrum Machine that included all stack testing and other testing records.

The Facility Response

16. On July 22, 2024, Spectrum Machine responded and provided documents requested during the July 2024 Inspection (July 2024 Response).
17. Spectrum Machine failed to provide documentation of any stack testing conducted at the Facility in the July 2024 Response.
18. The narrative in the July 2024 Response states: “As best as I could determine, no ‘Stack Testing’ has been completed.”

Violations

19. Spectrum Machine failed to conduct performance testing, in violation of Subpart TTTTTT, at 40 C.F.R. § 63.11466(a); and Permit Conditions C. 1. f) (1) and C. 2. f) (1).

20. Spectrum Machine failed to install, operate, and maintain a BLDS for the affected sources, in violation of Subpart TTTTTT, at 40 C.F.R. § 63.11468(c).

Environmental Impact of Violations

21. These violations can cause excess emissions of PM and lead.

Particulate matter: PM, especially fine particulates, contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. PM exposure contributes to:

- * irritation of the airways, coughing, and difficulty breathing;
- * decreased lung function;
- * aggravated asthma;
- * chronic bronchitis;
- * irregular heartbeat;
- * nonfatal heart attacks; and
- * premature death in people with heart or lung disease.

Lead: Once lead enters the body it distributes through blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen carrying capacity of the blood. The most common lead effects currently are neurological effects in children and cardiovascular effects (e.g., high blood pressure and heart disease) in adults. Infants and young children are especially sensitive to lead, which may contribute to behavioral problems, learning deficits and lowered IQ.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division