

NESHAP/Air Enforcement: U.S. Environmental Protection Agency and Alliance, Ohio Steel Foundry Enter into Consent Agreement



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The United States Environmental Protection Agency (“EPA”) and Alliance Castings Company, LLC (“Alliance”) entered into an August 23rd Consent Agreement and Final Order (“CAFO”) addressing alleged violations of a Clean Air Act National Environmental Hazardous Air Pollution Standard (“NESHAP”). See Docket No. CAA-05-2018-0020.

The CAFO states that Alliance owns and operates a steel foundry (“Foundry”) in Alliance, Ohio.

The Foundry is stated to have several emission units. The emission units include an electric arc furnace.

The Foundry was stated to have been constructed prior to December 23, 2002. As a result, it is an existing affected source under the Clean Air Act NESHAP for Iron and Steel Foundries.

EPA issued a Notice and Finding of Violation that Alliance, among other things:

. . . violated the NESHAP for Iron and Steel Foundries by failing to demonstrate compliance with the building opacity limits and failing to operate its baghouse in accordance with good air pollution control practices for minimizing emissions and in accordance with its operation and maintenance plan.

EPA therefore found that the Foundry violated:

- 40 C.F.R. § 63.7731(b)
- 40 C.F.R. § 63.7732(d)(1)
- 40 C.F.R. § 63.6(e)(1)(i)
- 40 C.F.R. § 63.7710(b)
- 40 C.F.R. § 63.7690(a)(7) (failure to demonstrate compliance with a limit)

The CAFO assesses a civil penalty of \$64,000. Alliance also agrees to perform a Supplemental Environmental Project (“SEP”).

The SEP is describe as involving paving of three areas of the plant to control fugitive dust emissions and reduce the quantity of airborne particulate matter at and near the facility. The CAFO describes the three areas to be paved and includes a required timeline.

A [copy of the CAFO](#) can be found here.