

ORIGINAL

JAN 03 2005

THOMAS, MAMER & HAUGHEY, LLP

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STATE OF ILLINOIS
Pollution Control Board
JAMES P. THOMAS
(1901-1990)

WALLACE M. MULLIKEN
(1913- 1967)

OF COUNSEL
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DAMIAN P. MARSHALL

December 27, 2004

Ms. Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph, Suite 402
Chicago, IL 60601

RE: People v. Alloy Engineering & Casting Company
PCB 01-155 (RCRA Enforcement - Air, Water)

Dear Ms. Gunn:

Enclosed for your information and filing is a Notice of Completion prepared in behalf of Alloy Engineering & Casting Company. I would ask that this notice be brought to the attention of the Board, as appropriate, such that this matter is dismissed. If there is a preferred method for securing the dismissal, please advise.

Sincerely,

THOMAS, MAMER & HAUGHEY, LLP



David E. Krchak

DEK/cjm

Enclosure

c: Mr. Robert Stanford
Mr. Joe Wells

ORIGINAL

RECEIVED
CLERK'S OFFICE

ILLINOIS POLLUTION CONTROL BOARD

JAN 03 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF)	
ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB 01-155
)	(RCRA Enforcement - Air, Water)
ALLOY ENGINEERING AND)	
CASTING COMPANY,)	
)	
Respondent.)	

NOTICE

Now comes the Respondent, Alloy Engineering and Casting Company, a Nevada corporation, by its attorneys, Thomas, Mamer & Haughey, LLP, by David E. Krchak, and as a Notice in this matter, provides as follows:

1. On February 4, 2003, the Respondent executed a stipulation to resolve pending matters in this case, which Stipulation for Settlement was executed by the Illinois Environmental Protection Agency on January 31, 2003, and the Attorney General, State of Illinois, on February 6, 2003.

2. The Stipulation and Order was the subject of a public hearing in Champaign, Illinois, on March 25, 2003. On July 10, 2003, the Illinois Pollution Control Board unanimously found that the Stipulation was an appropriate resolution to the matter, and incorporated the following provisions of the Stipulation into their Order:

A. Alloy pay a civil penalty of \$75,000.00 no later than October 8, 2003.

B. Alloy perform three Supplemental Environmental Projects (SEP's) within two years of the entry of the Order.

3. On October 1, 2003, the Respondent submitted a cashier's check in the sum of \$75,000.00 drawn on Central Illinois Bank and payable to the Illinois Environmental Protection Agency, designated to the Environmental Protection Trust Fund.

4. The first SEP involved the implementation of electronic photohelic controls to improve the pulsing cleaning system of emission control devices. This SEP was to be completed by September 1, 2003. The Illinois EPA was advised on August 25, 2003, that the project was completed and the controls were implemented. Mr. Darwin Fields of the Illinois EPA confirmed on November 13, 2003, that the installation had indeed been completed. (See Exhibit 1, letter from Lawson "Joe" Wells to Ms. Crystal Myers-Wilkens dated November 14, 2003.)

5. The second SEP involved the repair and replacement of emission control ducting. The deadline for that project was July 17, 2005. The Illinois EPA was advised on May 7, 2004, that the project had been completed. (See Exhibit 2, letter

dated May 14, 2004, from Lawson "Joe" Wells to Ms. Crystal Myers-Wilkens.)

6. The third SEP required the implementation of broken bag detectors in exhaust stacks of the emission control devices. The deadline for implementation of those improvements was July 17, 2005. On December 1, 2004, the Respondent advised the Illinois Environmental Protection Agency that SEP #3 had been completed by December 1, 2004. (See Exhibit 3, letter from Lawson "Joe" Wells on December 10, 2004, to Ms. Crystal Myers-Wilkens.)

7. With the completion of the payment and all three of the SEP's, the Order of the Board of July 17, 2003, has been fulfilled.

WHEREFORE, the Respondent prays that this Notice be placed on file with the Illinois Pollution Control Board and the matter be closed.

Respectfully submitted,

ALLOY ENGINEERING AND CASTING
COMPANY

BY: THOMAS, MAMER & HAUGHEY, LLP

BY: 
DAVID E. KRCHAK

CERTIFICATE OF SERVICE

DAVID E. KRCHAK hereby certifies that he mailed a true and correct copy of the foregoing NOTICE to:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph, Suite 402
Chicago, IL 60601

Thomas Davis
Assistant Attorney General
Chief Environmental Bureau
500 S. Second St.
Springfield, IL 62706

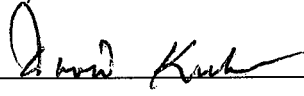
Crystal Myers-Wilkens
Illinois Environmental
Protection Agency
Bureau of Air
Division of Legal Counsel
P.O. Box 19276
Springfield, IL 62794-9276

John McMahon
Wilkie & McMahon
One Main St., Suite 214
Champaign, IL 61820

Robert M. Olian
Sidley, Austin, Brown & Wood
Bank One Plaza
10 S. Dearborn St.
Chicago, IL 60603

Kevin Ward
Cox & Ward, P.C.
612 Spring Street
P.O. Box 252
Galena, IL 61036

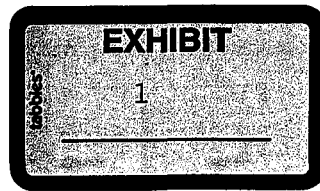
by placing same in the U.S. Mail, first class postage fully prepaid, on the 27th day of December, 2004.



David E. Krchak
THOMAS, MAMER & HAUGHEY, LLP
P.O. Box 560
Champaign, IL 61824-0560
(217) 351-1500

alloy engineering & casting company

1700 west washington street • champaign, IL 61821
tel 217 398 3200 • fax 217 398 3208



November 14, 2003

Illinois Environmental Protection Agency
Bureau of Air
Division of Legal Counsel
P.O. Box 19276
Springfield, Illinois 62794-9276

Attention: Ms. Crystal Myers-Wilkens

Subject: Order of the Illinois Pollution Control Board PCB 01-155

Dear Ms. Myers-Wilkens

Pursuant to Illinois Pollution Control Board Order adopted on July 10, 2003 and received at Alloy Engineering & Casting Company on July 17, 2003, the following is respectfully submitted to confirm compliance of the order.

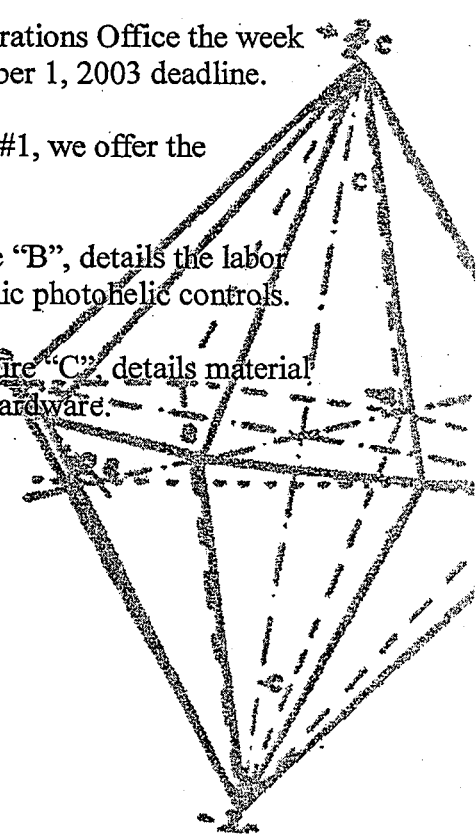
A civil penalty of \$75,000 was submitted to the Agency on October 1, 2003 which was due no later than October 8, 2003. A copy of cashiers check #248706 is enclosed for your reference.

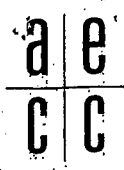
As proposed by Alloy Engineering & Casting Co and accepted by the Illinois Pollution Control Board, Supplemental Environmental Project #1 was to be completed by September 1, 2003. The subject SEP was to implement electronic photohelic controls to the pulse cleaning system of five emission control devices at the Alloy facility in Champaign, Illinois.

I verbally advised Mr. Darwin Fields at the IEPA Champaign Field Operations Office the week of August 25, 2003 that SEP#1 had been completed prior to the September 1, 2003 deadline.

As confirmation of compliance to Supplemental Environmental Project #1, we offer the following enclosed documentation for your consideration;

- A) Project Labor Cost Summary, enclosed and labeled enclosure "B", details the labor costs associated with planning and installation of the electronic photohelic controls.
- B) Project Material Cost Summary, enclosed and labeled enclosure "C", details material costs associated with the electronic photohelic controls and hardware.





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tel 217 398 3200 • fax 217 398 3208

C) Photographs of each set of photohelic controls at the five respective pulse type emission control devices are on the attached CD diskette and labeled as.

- Southwest emission control device - Photo's 4, 5, 6, & 7
- South emission control device - Photo's 8, 9, 10, 11, & 12
- Torit emission control device - Photo's 13, 14, & 15
- North CSI emission control device - Photo's 16, 18, & 20
- South CSI emission control device - Photo's 17, 19, & 22

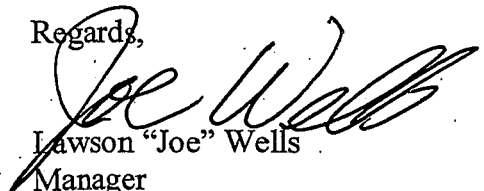
Be advised that Alloy Engineering & Casting Co is currently moving forward to implement Supplemental Environmental Projects #2 & #3 as per the Illinois Pollution Control Boards order.

The board order stated that the "Agency" be notified of SEP completion. Aside from sending a copy of this notification to Mr. John Justice, I have not copied other departments within the agency. In the event other departments require notification, please advise of who needs notification and I will do so accordingly.

Also, during a site visit and audit conducted by BOA-FOS Mr. Darwin Fields on November 13, 2003, Mr Fields was shown the photohelic control installation at one of the emission control devices as further confirmation.

Should you have questions pertaining to the above please do not hesitate to contact me at 217-355-4190 or via email at joe.wells@aecco.com.

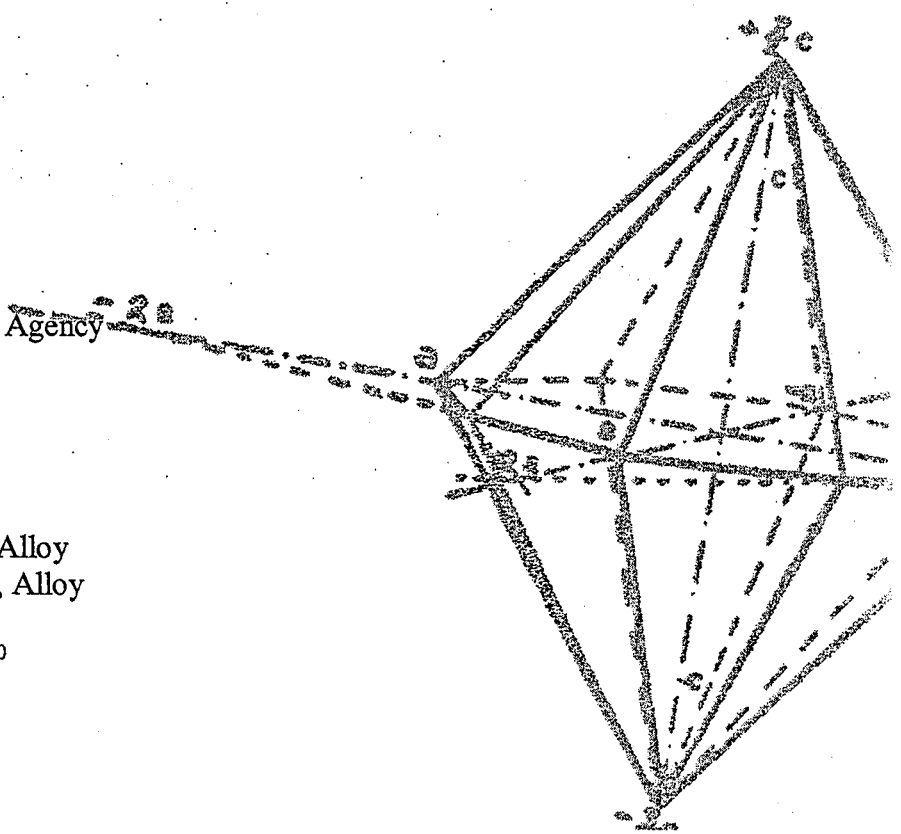
Regards,

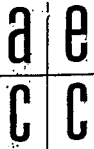

Lawson "Joe" Wells
Manager
Facilities, Maintenance, & Safety

Enclosures

CC: Mr. John B. Justice
Illinois Environmental Protection Agency
Bureau of Air
Field Operations Section
2009 Mall Street
Collinsville, Illinois 62234

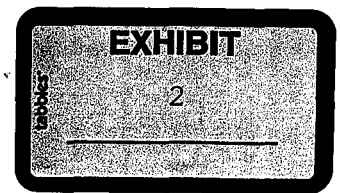
Mr. Mark Chandler – President, Alloy
Mr. Robert Stanford – Controller, Alloy





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1700 west washington street • champaign, IL 61821
tel 217 398 3200 • fax 217 398 3208



May 14, 2004

Illinois Environmental Protection Agency
Bureau of Air
Division of Legal Counsel
P.O. Box 19276
Springfield, Illinois 62794-9276

Attention: Ms. Crystal Myers-Wilkens

Subject: Order of the Illinois Pollution Control Board PCB 01-155

Dear Ms. Myers-Wilkens

Pursuant to Illinois Pollution Control Board Order adopted on July 10, 2003 and received at Alloy Engineering & Casting Company on July 17, 2003, the following is respectfully submitted to confirm further compliance of the order.

As per the IPCB order, a civil penalty has been submitted and Supplemental Environmental Project #1 was completed per the order. Please reference Alloy Engineering & Casting Co's previous submittal dated November 14, 2003, which detailed the specifics of the compliance.

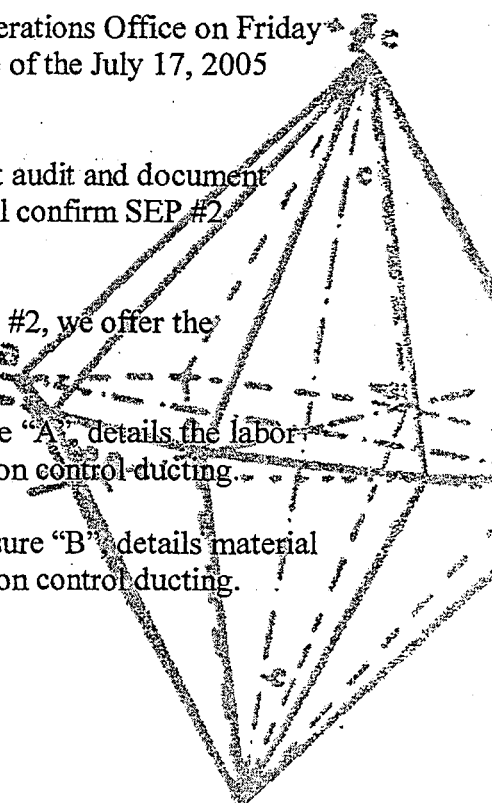
As proposed by Alloy Engineering & Casting Co and accepted by the Illinois Pollution Control Board, Supplemental Environmental Project #2 has been completed. The subject SEP was to repair or replace air emission control ducting within two years of the IPCB order.

I verbally advised Mr. Darwin Fields at the IEPA Champaign Field Operations Office on Friday May 7, 2004 that SEP #2 has been completed, which is well in advance of the July 17, 2005 deadline.

Mr. Darwin Fields, IEPA – BOA – FOS, is scheduled to conduct a plant audit and document review at the Alloy facility on Friday May 21, 2004 at which time I will confirm SEP #2 implementation.

As confirmation of compliance to Supplemental Environmental Project #2, we offer the following enclosed documentation for your consideration:

- A) Project Labor Cost Summary, enclosed and labeled enclosure "A" details the labor costs associated with the repair or replacement of air emission control ducting.
- B) Project Material Cost Summary, enclosed and labeled enclosure "B" details material costs associated with the repair or replacement of air emission control ducting.



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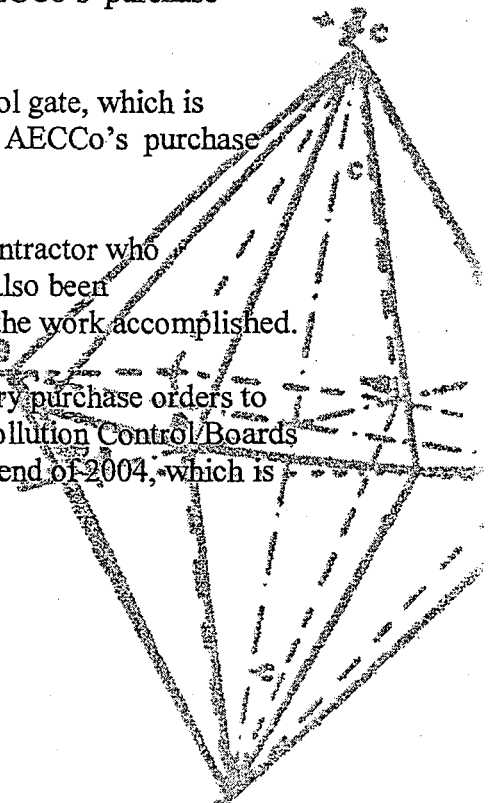
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tel 217 398 3200 • fax 217 398 3208

C) Photographs depicting the installation of representative emission control devices are on the attached CD diskette and labeled as enclosure "C";

- Photo's 001, 002, 003, 017, 018, 019, 020, 021, & 022 depicts the new emission control ducting, drops, & damper control gates for the Centrifugal Casting Processes. Reference AECCo purchase order J0443 on enclosure "B".
- Photo's 004 & 005 depicts the additional ducting and damper control gates for the CGC shakeout system. Reference AECCo purchase order # J0443 on enclosure "B"
- Photo #006 depicts the replacement elbow and damper control gates at the CGC Vibramill lump reduction machine. Reference AECCo purchase order #A1211 on enclosure "B"
- Photo's 007 & 008 depicts the skirting and dust capture enclosure at the CGC Vibramill lump reduction machine. Reference AECCo purchase order #J0443 on enclosure "B"
- Photo's 009, 011, 012, 013, 014, 015, 016 depicts the emission control ducting, drops, hoods & damper control gates installed in the CGC finishing department. Reference AECCo purchase orders A1891 & A2927 on enclosure "B".
- In addition, the North CSI emission control device was tested and balanced to ensure optimum operating capability. Reference AECCo's purchase orders A1243 & A1891 on enclosure "B".
- Photo 010 depicts the repaired elbow and damper control gate, which is connected to the CGC shot blasting process, Reference AECCo's purchase orders A2271 on enclosure "B".

D) Copies of AECCo's purchase orders to a local mechanical contractor who specializes in industrial ventilation & emission control have also been included, and labeled attachment "D", to depict the scope of the work accomplished.

Be advised that Alloy Engineering & Casting Co has issued the necessary purchase orders to implement Supplemental Environmental Project #3 as per the Illinois Pollution Control Boards order. It is also our expectation to have SEP #3 completed prior to the end of 2004, which is again in advance of the ordered deadline.



a | e
c | c

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The board order stated that the "Agency" be notified of SEP completion. Aside from sending a copy of this notification to Mr. John Justice, I have not copied other departments within the agency. In the event other departments require notification, please advise of whom needs notification and I will do so accordingly.

Be assured that although we have completed this particular SEP, we will continue to maintain our emission control systems as part of our continuous improvement programs and preventative maintenance systems.

I would greatly appreciate acknowledgement of this submittal and your acceptance of compliance.

Should you have questions pertaining to the above please do not hesitate to contact me at 217-355-4190 or via email at joe.wells@aecco.com.

Regards,



Lawson "Joe" Wells
Manager
Facilities, Maintenance, & E.M.S

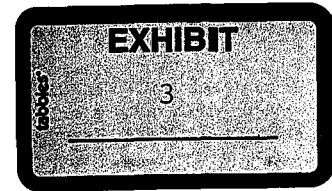
Enclosures

CC: Mr. John B. Justice
Illinois Environmental Protection Agency
Bureau of Air
Field Operations Section
2009 Mall Street
Collinsville, Illinois 62234

Mr. Robert Stanford – General Manager / CFO
Alloy Engineering & Casting Company

alloy engineering & casting company

1700 west washington street • champaign, IL 61821
tel 217 398 3200 • fax 217 398 3208



December 10, 2004

Illinois Environmental Protection Agency
Bureau of Air
Division of Legal Counsel
P.O. Box 19276
Springfield, Illinois 62794-9276

Attention: Ms. Crystal Myers-Wilkens

Subject: Order of the Illinois Pollution Control Board PCB 01-155

Dear Ms. Myers-Wilkens

Pursuant to Illinois Pollution Control Board Order adopted on July 10, 2003 and received at Alloy Engineering & Casting Company on July 17, 2003, the following is respectfully submitted to confirm full compliance of the order.

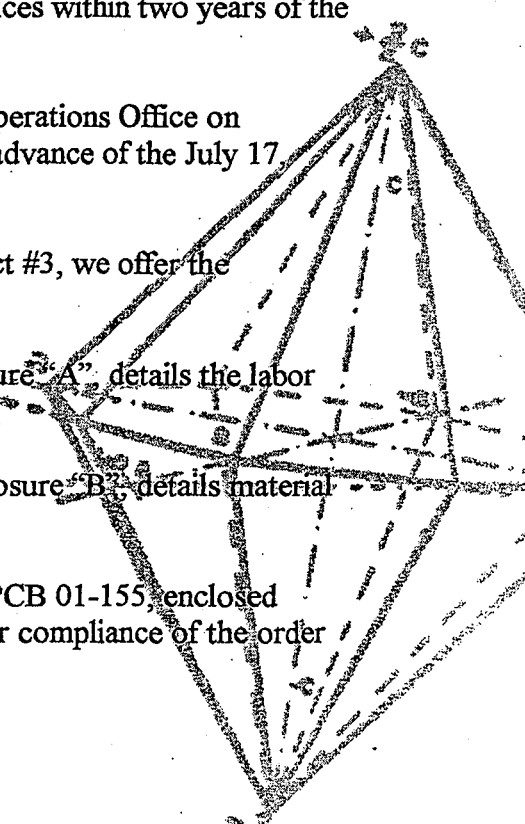
As per the IPCB order, a civil penalty was submitted and Supplemental Environmental Projects #1 & #2 were completed per the order. Please reference Alloy Engineering & Casting Co's previous submittals dated November 14, 2003 & May 14, 2004, which detailed the specifics of the compliance.

As proposed by Alloy Engineering & Casting Co and accepted by the Illinois Pollution Control Board, Supplemental Environmental Project #3 has been completed. The subject SEP was to install broken bag detectors in exhaust stacks of emission control devices within two years of the IPCB order.

I verbally advised Mr. Darwin Fields at the IEPA Champaign Field Operations Office on December 1, 2004 that SEP #3 has been completed, which is well in advance of the July 17, 2005 deadline.

As confirmation of compliance to Supplemental Environmental Project #3, we offer the following enclosed documentation for your consideration.

- A) Project Labor Cost Summary, enclosed and labeled enclosure "A", details the labor costs associated with the broken bag detector project.
- B) Project Material Cost Summary, enclosed and labeled enclosure "B", details material costs associated with the broken bag detector project.
- C) SEP project cost summary for compliance to IPCB order PCB 01-155, enclosed and labeled enclosure "C", details the total expenditures for compliance of the order





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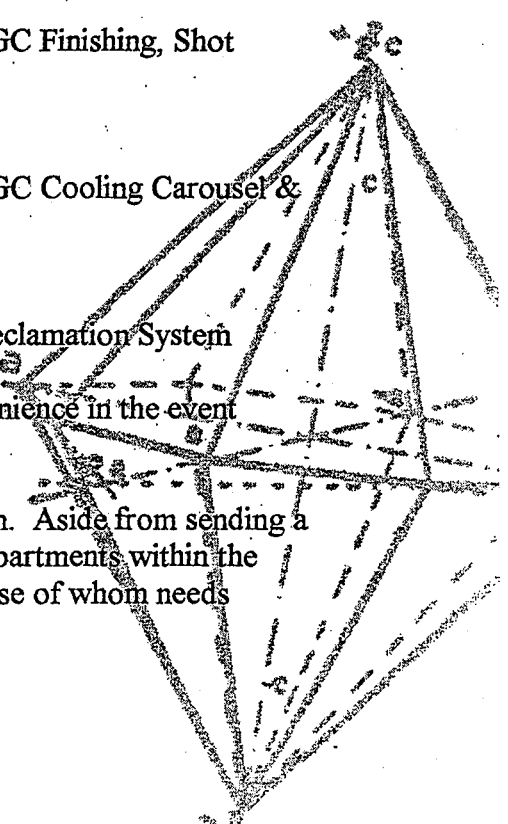
which exceeds the stipulated settlement "Penalty Offset" by \$16,154.76.

D) Photographs depicting installation of the respective broken bag detectors and control modules are enclosed which have been labeled as per the following;

- Photo's A1, A2, A3, & A4
Northwest Micropul Modulaire Emission Control Device servicing the Electric Arc Furnaces
- Photo's A5, A6, A7, & A8
Southwest Wheelabrator Frye Emission Control Device servicing the Static Finishing & Centrifugal Casting
- Photo A9, A10, & A11
South Micropul Pulse-Air Emission Control Device servicing the Static Foundry, Static Shotblast, & Static Material handling
- Photo's A12 & A13
Torit Emission Control Device servicing the Static Green Sand Reclamation
- Photo's A14, A15, & A20
Northeast Griffen Emission Control Device servicing the CGC Induction Melt Furnaces
- Photo A16, A17, A22, & A23
North CSI Emission Control Device servicing the CGC Finishing, Shot blasting, & Material Handling
- Photo A18, A24, & A25
South CSI Emission Control Device servicing the CGC Cooling Carousel & Material Handling
- Photo B1, B2, B4, & B5
Emission Control Device servicing the CGC Sand Reclamation System

I would be pleased to accommodate a visit from Mr. Fields at his convenience in the event confirmation of project installation is necessary.

The board order stated that the "Agency" be notified of SEP completion. Aside from sending a copy of this notification to Mr. John Justice, I have not copied other departments within the agency. In the event other departments require notification, please advise of whom needs notification and I will do so accordingly.



a | e
c | c
alloy engineering & casting company

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tel 217 398 3200 • fax 217 398 3208

Be assured that although we have finalized compliance of IPCB order #01-155, we are committed to maintaining our emission control systems and our environmental management systems as part of our continuous improvement programs and preventative maintenance systems.

I would greatly appreciate acknowledgement of this submittal and your acceptance of compliance.

Should you have questions pertaining to the above please do not hesitate to contact me at 217-355-4190 or via email at joe.wells@aecco.com.

Regards,

Lawson "Joe" Wells

Lawson "Joe" Wells
Manager
Facilities, Maintenance, & E.M.S

Enclosures

CC: Mr. John B. Justice
Illinois Environmental Protection Agency
Bureau of Air
Field Operations Section
2009 Mall Street
Collinsville, Illinois 62234

Mr. Robert Stanford – General Manager / CFO
Alloy Engineering & Casting Company

Environmental/Letters/IPCB SEP #3 confirmation

