





State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Richland County
Bunting Bearings, LLC.
Premise # 03.70.01.0292
Notice of Violation (NOV)

November 26, 2008

CERTIFIED MAIL

Mr. Phillip Henzler, Sr.
Corporate Director, Human Resources
Bunting Bearings, LLC
1001 Holland Park Boulevard
Holland, Ohio 43528

Dear Mr. Henzler:

This letter shall serve as follow-up to the inspection conducted on November 18, 2008, of the Bunting Bearings facility in Mansfield, Ohio by Ms. E. Jay Murphy and myself. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

Based on our discussions, our observations during the inspection and a review of the company's files, there are several issues to be resolved and clarified. A summary table has been attached that includes, among other things, the EPA emissions unit identification (EU ID) number, the facility's description of the unit and a brief description of the unit or operation. This attachment may be referenced regarding the information below and clarifies the discrepancies in the EU IDs, as discussed at the time of the inspection. Please find below a brief description of noted violations, information that is being requested for further evaluation or possible remedies for the violations pertaining to each emissions unit:

- F001: Please submit complete, updated permit applications including all emissions activity category (EAC) forms and emissions calculations.

- F002: Please submit complete, updated permit applications including all EAC forms and emissions calculations.

- F003: Please submit complete, updated permit applications including all EAC forms and emissions calculations.

- F004: Please submit complete, updated permit applications including all EAC forms and emissions calculations.
- F010: Please submit complete, updated permit applications including all EAC forms and emissions calculations.
- P002: Specify if this unit is still (12) natural gas fired furnaces or (11) natural gas fired furnaces (one being replaced by the lift swing furnace). Please submit complete, updated applications including all EAC forms and emissions calculations. Units are exempt from PTI requirements (installed before January 1, 1974), but need PTOs.

Current Ohio EPA permitting methods do not allow for grouping of units, as was done with these furnaces in the past. Therefore, a complete application, EAC form and emissions calculation will be needed for each furnace, individually. However, with each furnace being permitted separately, there is a possibility that each furnace will meet the criteria to be considered a "de minimis" emissions unit, which could eliminate the need for permitting altogether. This office will make that determination once the information requested above is received.

- P003: Units vent to a common cyclone followed by a "HEPA filter". Please provide the exhaust flow of the control unit, in actual cubic feet per minute (ACFM). Please provide the grain loading concentration of the exhaust of the filter, in grains per dry standard cubic foot (gr/dscf). Is this filter unit equipped with any type of parametric monitoring device (ex. a pressure differential gauge, AKA: Magnahelic gauge) to determine when the filter needs changed? If so, at what reading is the filter changed?

This unit may require permitting if it does not qualify for exemption under OAC rule 3745-31-03(A)(1)(y). This office will make that determination once the information requested above is received.

- P004: Please submit complete, updated permit applications including all EAC forms and emissions calculations.
- P005: Please submit complete, updated permit applications including all EAC forms and emissions calculations.
- P006: Please submit complete, updated permit applications including all EAC forms and emissions calculations.

#3 Continuous Casting Machine (with baghouse): Ohio EPA is assuming that this emissions unit requires permitting, based on a comparison to similar emissions units at the facility.

The information below is being cited as a violation. Should the company be able to provide an exemption for this unit or show that it qualifies for "de minimis" status, as defined in Ohio Administrative Code (OAC) rule 3745-15-05, this violation will be rescinded.

This equipment was installed without being issued permits to install or operate. Installing and operating an air contaminant source without first obtaining the appropriate permit to install (PTI) and permit to operate (PTO) is a violation of OAC rule 3745-31-02(A) and OAC rule 3745-35-02(A), respectively, and is also a violation of Ohio Revised Code (ORC) 3704.05.

The remedy to this violation will be to obtain the proper permits for this equipment. Please submit complete permit applications including all EAC forms and emissions calculations.

Lift Swing Furnace: This equipment was installed without being issued permits to install or operate. Installing and operating an air contaminant source without first obtaining the appropriate permit to install (PTI) and permit to operate (PTO) is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A) and OAC rule 3745-35-02(A), respectively, and is also a violation of Ohio Revised Code (ORC) 3704.05.

The remedy to this violation will be to obtain the proper permits for this equipment. Please submit complete permit applications including all EAC forms and emissions calculations.

Ball Mill (with baghouse): This office has no record of this operation. Please supply the following information: the date this equipment was installed; the exhaust rate of this equipment, in ACFM, and; the grain loading concentration of the exhaust, in gr/dscf.

This unit may require permitting if it does not qualify for exemption under OAC rule 3745-31-03(A)(1)(y). This office will make that determination once the information requested above is received.

Chip Dryer (with baghouse): This office has no record of this operation. Please supply the following information: the date this equipment was installed; the exhaust rate of this equipment, in ACFM, and; the grain loading concentration of the exhaust, in gr/dscf.

This unit may require permitting if it does not qualify for exemption under OAC rule 3745-31-03(A)(1)(y). This office will make that determination once the information requested above is received.

Wheelabrator (with baghouse): This office has no record of this operation. Please supply the following information: the date this equipment was installed; the exhaust rate of this equipment, in ACFM, and; the grain loading concentration of the exhaust, in gr/dscf.

This unit may require permitting if it does not qualify for exemption under OAC rule 3745-31-03(A)(1)(y). This office will make that determination once the information requested above is received.

Graphite Machining Operations (with baghouse): This office has no record of this operation. Please supply the following information: the date this equipment was installed; the exhaust rate of this equipment, in ACFM, and; the grain loading concentration of the exhaust, in gr/dscf.

This unit may require permitting if it does not qualify for "de minimis" status, as defined in Ohio Administrative Code (OAC) rule 3745-15-05. This office will make that determination once the information requested above is received.

(2) CNC Graphite Machining Mills (with baghouse): This office has no record of this operation. Please supply the following information: the date this equipment was installed; the exhaust rate of this equipment, in ACFM, and; the grain loading concentration of the exhaust, in gr/dscf.

This unit may require permitting if it does not qualify for "de minimis" status, as defined in Ohio Administrative Code (OAC) rule 3745-15-05. This office will make that determination once the information requested above is received.

Ladle Pre-Heater: This office has no record of this operation. Please supply the following information: the date this equipment was installed, and; the heat rating of this unit, in BTU/hour.

This unit may require permitting if it does not qualify for "de minimis" status, as defined in Ohio Administrative Code (OAC) rule 3745-15-05. This office will make that determination once the information requested above is received.

The company's written response to this letter is requested by January 1, 2009 and should be submitted to Ohio EPA, Northwest District Office. The response should include all requested information noted above as well as a compliance plan to remedy the observed situations and prevent this, or any similar such situation, from occurring in the future.

Mr. Phillip Henzler, Sr.
November 26, 2008
Page 5

Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3137, or electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/llr

pc: Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC - CO
Don Waltermeyer, DAPC - NWDO
Thomas C. Cikotte, DAPC - NWDO

