



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 22, 2011

Franklin County  
Hamilton Tanks, LLC  
Ohio ID Number 0125041287  
Air Compliance Evaluation

Randy Smith  
Hamilton Tanks, LLC  
2200 Refugee Road  
Columbus, OH 43207

Re: **Notice of Violation** based upon the June 14, 2011, Hamilton Tanks, LLC full air compliance evaluation

Dear Mr. Smith:

Ohio EPA, Central District Office (CDO) inspectors Barbara Walker and Luke Mountjoy conducted a full compliance inspection of Hamilton Tanks, LLC on June 14, 2011. The purpose of the inspection was to evaluate compliance with the terms and conditions of the applicable Federally Enforceable Permit-to-Install and Operate (FEPTIO).

Listed below are "Findings" based upon CDO observations and conversations with facility personnel. The findings are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

1. **Finding:** Failure to install monitoring equipment on control device.

During the facility compliance evaluation, CDO personnel observed that a pressure monitoring device was not installed on the baghouse controlling emissions from the sand grit blasting operations (P003). Permit-to-install and operate P0103970 requires the monitoring equipment device be installed, operated and maintained on the control equipment.

**Violation**

Operation of emission unit P003 without the required monitoring equipment is considered a violation of the terms and conditions of permit-to-install and operate (PTIO) P0103970 which states:

*"The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual."*

Violation of the terms and conditions of PTIO P0103970 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

*"No person who is the holder of a permit ...shall violate any of its terms or conditions."*

**Requested Action**

CDO requests that Hamilton Tanks, LLC install, calibrate and operate a parametric pressure monitoring device in accordance with manufacturer's recommendations within sixty (60) days to satisfy the terms and conditions of PTIO P0103970.

2. **Finding:** Failure to fully enclose spray booth operations.

During the facility compliance evaluation on June 14, 2011, CDO personnel observed that the doors on the tank spray coating operation (K002) were not fully closed. When questioned if the doors were operated differently during the coating operations, facility personnel stated that the doors were kept as they were observed.

**Violation**

Operation of the spray coating emission units K001 and K002 with doors partially open is a violation of the terms and conditions of section C.1.b)(2)b. and C.2.b)(2)b. which states:

*"Each emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. ... in order to maintain the highest effective level of particulate emissions control."*

Violation of the terms and conditions of PTIO P0103970 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C).

**Requested Action**

CDO requests that Hamilton Tanks, LLC immediately ensure that all spray booth doors are fully closed during coating operations to ensure particulate emission control in compliance with the terms and conditions of PTIO P0103970.

3. **Finding:** Failure to perform monitoring and recordkeeping.

During the facility compliance evaluation on June 14, 2011, CDO personnel requested a review of all monitoring records being maintained by Hamilton Tanks. CDO personnel were presented with usage and emission records for emission units K001 and K002. Individual and combined rolling, 12-month records of hazardous air pollutants (HAP)

have not been maintained by the facility. Spray booth exhaust filter maintenance records have not been maintained in an operations log at the facility.

During the facility compliance inspection, CDO personnel were informed that monitoring and recordkeeping for the sand grit blasting (P003) was not performed.

#### **Violation**

Operation of emission units K001 and K002 without maintaining records of the hazardous air pollutants is considered a violation of sections C.1.d)(2) and C.2.d)(2) of the terms and conditions of permit-to-install and operate (PTIO) P0103970. Operation of the spray booths K001 and K002 without maintaining exhaust filter maintenance logs is considered a violation of sections C.1.b)(2)b. and C.2.b)(2)b. of PTIO P0103970.

Operation of P003 without performing the required recordkeeping is a violation of section C.4.d)(1) of the terms and conditions of PTIO P0103970 which states:

*"...The permittee shall record the following on a daily basis:*

- a. the pressure drop across the baghouse for each day when the emission unit operates; and*
- b. A log or record of the downtime for the control device and monitoring equipment when the emissions unit was in operation".*

Violation of the terms and conditions of PTIO P0103970 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C).

#### **Requested Action**

CDO requests that Hamilton Tanks, LLC immediately comply with all monitoring and recordkeeping requirements in accordance with the terms and conditions in PTIO P0103970.

4. **Finding:** Failure to perform required reporting.

Prior to the inspection on June 14, 2011, CDO personnel observed the required quarterly reports and annual permit evaluation report (PER) had not been submitted through eBusiness Center: Air Services.

#### **Violation**

Failure to submit quarterly reports for K001 and K002 is a violation of section C.1.e)(1) and C.2.e)(1) of the terms and conditions of PTIO P0103970. Failure to submit the annual permit evaluation report (PER) by November 15 is a violation of sections C.1.e)(2), C.2.e)(2) and C.4.(e)(2) of the terms and conditions of PTIO P0103970.

Violation of the terms and conditions of PTIO P0103970 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C).

### **Requested Actions**

CDO requests that Hamilton Tanks, LLC immediately comply with all reporting requirements in accordance with the terms and conditions in PTIO P0103970. Additionally, CDO requests that Hamilton Tanks, LLC submit quarterly reports required since November 2008 and the annual report evaluation report (PER) for the reporting period October 1, 2009 through September 30, 2010, within thirty (30) days.

### **Summary of Requested Actions**

CDO requests the following actions to be performed:

1. Install and operate a pressure monitoring device for P003 within sixty (60) days;
2. Immediately ensure spray coating operation booth doors are fully closed during coating operations;
3. Immediately perform all required monitoring and recordkeeping;
4. Immediately comply with all required reporting; and
5. Within thirty (30) days, submit quarterly reports since November 2008 and the 2010 annual permit evaluation report (PER).

### **Additional Information**

Hamilton Tanks, LLC is a Synthetic Minor Title V (SMTV) facility. All SMTV facilities are required to submit certain reports via the eBusiness Center: Air Services, which is accessed through the eBusiness Center. The eBusiness Center may be reached from the Ohio EPA home page at <http://www.epa.ohio.gov> or directly at <http://ebiz.epa.ohio.gov>.

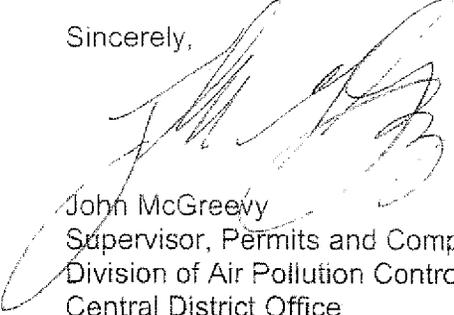
If at some time in the future this facility plans to install additional air contaminant sources or modify an existing air contaminant source, please contact Ohio EPA, Central District Office to obtain appropriate forms and discuss the applicability of any rules in question. Ohio EPA endeavors to process all applications in an expeditious manner.

Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

Randy Smith  
Hamilton Tanks, LLC  
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If you have any questions, please contact Barbara Walker of my staff at (614) 728-3805 or [Barbara.walker@epa.ohio.gov](mailto:Barbara.walker@epa.ohio.gov).

Sincerely,



John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

Enclosure

c: Adam Ward, Manager, DAPC/CDO  
Kelly Toth, DAPC/CDO  
Barbara Walker, DAPC/CDO  
John Paulian, DAPC/CO

e: John McGreevy, DAPC/CDO

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