



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

October 15, 2012

RE: Morgan County  
Hann Manufacturing  
Facility ID #0658000069  
Inspection Letter  
Notice of Violation  
Non-HPV

Certified: 70102780000197044909

Mr. Darl Hann  
Hann Manufacturing  
POB 400  
Malta, OH 43758

Dear Mr. Hann:

On August 14, 2012, Ohio EPA, Division of Air Pollution Control (DAPC), Southeast District Office (SEDO), inspected the Hann Manufacturing facility located at 4678 State Route 60 NW, in McConnelsville, Ohio. The purpose of the inspection was to determine the company's status of compliance with state and federal air pollution regulations and the air permits issued for this facility. Ohio EPA was represented by Jessica Kelley, Racheal Davies and me, and Cory Hann represented Hann Manufacturing during the inspection.

Hann Manufacturing is currently operating emissions units (EUs) P901 (Fugitive dust recovery system) subject to permit-to-install (PTI) 06-4795 issued May 30, 1996, and P902 (Sawdust bagging and collection system) subject to PTI 06-06828 issued July 2, 2002. The permit-to-operate (PTO) application for P901 has been submitted and is currently under review. A review of the applications submitted indicates that a PTO application for P902 was never submitted. There is also a spray booth (EU R001) that still operates and has been considered exempt from permitting requirements per OAC 3745-31-03(A)(1)(kk).

At the time of the inspection, emissions units P901 and P902 were in operation.

Based on observations during the facility tour, file review, and a review of the reports, the following violations were discovered. Copies of the checklists completed as part of the inspection are enclosed.

**(1) Maintenance of Equipment**

***AIR EMISSION SUMMARY and MAINTENANCE OF EQUIPMENT of PTI 06-4795 for EU P901***

Permit 06-4795 specifies under the AIR EMISSION SUMMARY that the Best Available Technology (BAT) determination of the saw dust collection system shall be "Total enclosure cyclone followed by a fabric filter". Further, the section MAINTENANCE OF EQUIPMENT specifies that "This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions."

During the inspection, we noted that there were significant accumulated saw dust piles on top of the collection system and on the ground surrounding it, indicating that the equipment is not being properly maintained and that particulate is not being properly controlled. Photos are enclosed. Failure to properly maintain control equipment is a violation of PTI 06-4795.

***Within 30 days of your receipt of this letter***, please submit to this office a plan and schedule that details the facility's strategy to return to compliance with permit terms and conditions.

**(2) No Visible Emissions and Operational Restrictions**

***Part II.A.1., Part II.A.2.a., and Part II.B.1. of PTI 06-06828 for EU P902***

Part II.A.1. of PTI 06-06828 for EU P902 (sawdust collection and bagging system with a cyclone) specifies that "There shall be no visible PE from the stack" and "There shall be no visible emissions of fugitive dust from any building egress points including doors, windows and vents." Further, Part II.A.2.a. of the permit further specifies that "The permittee shall employ best available control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee shall maintain enclosures and vent emissions to the control equipment to ensure compliance." Per the operational restrictions contained in Part II.B.1., "The sawdust collection and bagging system shall not be operated without a control system."

During the inspection, we noted that there were visible fugitive emissions of sawdust coming out of the sawdust collection and bagging system. Further, there was a hose that was no longer connected to the bagging system designed to contain the fugitive emissions and that hose was lying on the ground and sawdust was emitting from it. There was no bag to collect the sawdust, and piles of sawdust were all over the ground. Photos are enclosed. The presence of visible emissions and failure to properly maintain control equipment is a violation of PTI 06-06828.

***Within 30 days of your receipt of this letter***, please submit to this office a plan and schedule that details the facility's strategy to return to compliance with permit terms and conditions.

**(3) Monitoring and/or Record Keeping Requirements**  
**Part II.C.1. of PTI 06-06828 for EU P902**

PTI 06-06828 specifies that "The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from any building egress points including doors, windows and vents, and any visible PE from the cyclone stack. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log: a. the color of the emissions; b. the cause of the visible emissions; c. the total duration of any visible emission incident; and d. any corrective actions taken to eliminate the visible emissions."

Hann Manufacturing failed to monitor and maintain records for daily VE checks in violation of PTI 06-06828.

**Within 30 days of your receipt of this letter**, please submit to this office a plan and schedule that details the company's strategy to ensure compliance with the monitoring and record keeping requirements in Hann Manufacturing's PTI for EU P902.

**(4) Reporting Requirements**  
**Part II.D.1 of the Permit for EU P902**

The reporting requirements specified in the permit state that "The permittee shall submit semi-annual written reports which (a) identify all days during which any visible fugitive emissions from any building egress points including doors, window and vents, and any visible PE from the cyclone stack were observed and (b) describe the corrective actions taken to eliminate the visible PE. These reports shall be submitted to the Ohio EPA Southeast District Office semi-annually, i.e., by February 15 and August 15 of each year and shall cover the previous six-month calendar year period."

Hann Manufacturing failed to submit semi-annual written reports since the PTI was issued on July 2, 2002.

**Within 30 days of your receipt of this letter**, please submit to this office a plan and schedule that details the company's strategy to ensure compliance with the reporting requirements in Hann Manufacturing's PTI for EU P902.

**Comments:**

- A PTO application needs to be submitted for EU P902. As indicated above, a PTO application was not found during a review of the facility's files in our office. If you did previously submit a PTO application for P902, please provide that at your earliest convenience.

- EU R001 – During the inspection, I received a copy of the monthly records for April, May, June and July of 2012. Please provide me with a copy of your coating records for 2011 and also the first three months of 2012, along with a copy of the MSD sheets for all coatings used at the facility.

Based upon the records you provided, the paint usage shows five gallons per day, which does not meet the permit exemption under Ohio Administrative Code 3745-31-03(A)(1)(kk), "*Coating applicators with properly designed and operated particulate matter control devices and venting systems that employ less than five gallons of only air-dried coating material in any one day...*". If you claim an exemption or de minimis status for this source, please provide detailed information, including the claimed exemption and calculations, to support this status.

I have enclosed information for Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP). Ralph Witte is the OCAPP contact for Ohio EPA's Southeast District Office, and his business card is enclosed. Please contact Mr. Witte if you would like assistance in submitting a PTO application for P902, and making a compliance plan and schedule in order to return the facility to compliance.

Acceptance by Ohio EPA of submitted information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you are unable to respond to any part of this request within the time frame discussed above, please contact me so that I may be of assistance. Should you have any questions or concerns, please feel free to contact me by telephone at (740) 380-5259 or via email at [miki.mercer@epa.state.oh.us](mailto:miki.mercer@epa.state.oh.us).

Sincerely,



Mykael Mercer  
Environmental Specialist II  
Division of Air Pollution Control  
Southeast District Office

MLM/cs

Enclosures

cc: Cory Hann, Hann Manufacturing  
Dean Ponchak, Acting Manager, DAPC-SEDO  
Sarah K. Harter, Supervisor, DAPC-SEDO  
Ralph Witte, OCAPP-SEDO  
Bruce D. Weinberg, DAPC/CO  
Michele Jencius, U.S. EPA, Region V