



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

RE: Erie County  
JBT FoodTech  
**Inspection/  
Notice of Violation (NOV/non-HPV)**

March 15, 2013

CERTIFIED MAIL

Mr. David Harrilla  
John Bean Technologies Corporation  
Food Solutions and Service Division  
1622 First Street  
Sandusky, Ohio 44870

Dear Mr. Harrilla:

As you are aware, the Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) conducted an unannounced inspection on March 7, 2013 of John Bean Technologies Corporation, Food Solutions and Service Division (here in referred to as "JBT FoodTech"). The purpose of the inspection was to determine the compliance status of any potential air contaminant emissions units located at the facility with the rules and regulations of the DAPC. Currently, the facility does not maintain any air emission permits with DAPC.

It is our understanding that the facility manufactures food equipment for food processing operations. The facility operations consist of fabricating, assembling, shaping, forming, and welding stainless steel. Some of the types of products produced at the facility include: freezers, fryers, peelers, breaders, and charmarkers in addition to other food processing solutions.

Based upon our inspection of the facility and our discussion with you on March 7, 2013 and a review of the information provided by you via email on March 8, 2013 the following was noted:

1. During the site visit on March 7, 2013, four air emissions sources were identified. Some sources of air pollution are exempt from obtaining air permits because the air emissions from these sources are low or below "de minimis" amounts as defined in Ohio Administrative Code (OAC) rule 3745-15-05. A company claiming a "de minimis" exemption is not required to provide notification to the Ohio EPA; however, the company must maintain records demonstrating that the source meets the exemption and actual emissions do not exceed "de minimis" thresholds. Other sources are specifically listed as exempt sources in Ohio's air pollution control regulations under OAC 3745-31-03(A). A company claiming a permanent exemption under this rule is not required to provide notification to the Ohio EPA. If an emission unit does not qualify as "de minimis" or for a permit exemption, the emission unit is subject to rules and regulations under OAC rule 3745-31-02 requiring a Permit-to-Install/Operate (PTIO).

a. Blasting Operations:

The facility operates one enclosed blasting room with a blasting capacity of 1,500 lbs/hour that is vented to a baghouse. Metallic abrasives consisting of steel shot are used as blasting media. The blasting room is used on a daily basis for approximately three hours per day. The manufacturer's control efficiency of the baghouse is 90%.

Abrasive blasting operations at the facility do not qualify for the listed permit exemption in OAC rule 3745-31-03(A) and therefore may require an air permit. Based on the information provided regarding the abrasive blasting unit and its rated maximum design capacity, it appears that the unit's potential to emit would be greater than 10 lbs/day, uncontrolled, and would therefore not qualify as a "de minimis" air emission source; therefore DAPC considers this to be a permissible air emission unit.

The installation and operation of this emission unit is in violation of OAC rule 3745-31-02 and Ohio Revised Code 3704.05. Therefore, JBT FoodTech is required to submit a Permit to Install/Operate (PTIO) application, Emissions Activity Category (EAC) form, emission calculations, and a process flow diagram for this emissions unit in order to correct this administrative violation. This application will be treated as an initial installation. A permit application and EAC form can be downloaded from the following link on Ohio EPA's website:  
<http://www.epa.ohio.gov/dapc/fops/eacforms.aspx>.

b. Welding Operations:

There are a total of four welding stations (three small weld stations and one large weld station) located inside the building which are not controlled and are vented inside the building. Welding operations do not fall under a listed permit exemption in OAC rule 3745-31-03(A) and therefore may require an air permit. Based on the information provided during the investigation it was not clearly ascertained whether the facility's welding operations would qualify for a "de minimis" exemption as defined in OAC rule 3745-15-05 or are subject to the rules and regulations under OAC rule 3745-31-02 regarding a PTIO. In order to determine the applicability and compliance with air pollution rules and regulations, it is necessary for JBT FoodTech to submit emission calculations. If emission calculations indicate emissions exceed ten pounds per day, JBT FoodTech will be required to obtain a PTIO for its welding operations.

c. Tumbler:

The facility utilizes one tumbler for cleaning and deburring of metal products without abrasive blasting. This emission unit qualifies for a permit exemption under OAC rule 3745-31-03(A)(1)(d).

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d. Boiler (5 mmBtu/hr):

The facility utilizes one boiler with a rated capacity of 5 million British thermal units per hour burning only natural gas. This emission unit qualifies for a permit exemption under OAC rule 3745-31-03(A)(1)(a).

I would like to thank you for the courtesy extended during our visit. JBT FoodTech is required to submit the information requested in Nos. 1a and 1b above no later than **April 17, 2013**.

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

Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at [Miranda.Garlock@epa.ohio.gov](mailto:Miranda.Garlock@epa.ohio.gov).

Sincerely,



Miranda R. Garlock  
Division of Air Pollution Control

/cg

pc: Certified Mail Receipt Number 7011350000082042500  
DAPC Erie County General File

ec: Miranda Garlock, NWDO, DAPC  
Chad Winebrenner, NWDO, DAPC  
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