

# AIR POLLUTION CONTROL DIVISION

OHIO EPA AGENCY 15 • APC CONTRACTUAL REPRESENTATIVE SERVING ALL OF STARK COUNTY



**Public Health**  
Prevent. Promote. Protect.

**TERRI A. DZIENIS**  
APCD ADMINISTRATOR

**JAMES M. ADAMS, RS, MPH**  
HEALTH COMMISSIONER

## CANTON CITY HEALTH DEPARTMENT

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### CERTIFIED MAIL

AUGUST 28, 2013

Charles Lane  
Harbor Castings, Inc  
4321 Strausser St NW  
North Canton, OH 44720

**Re: NOTICE OF VIOLATION; Significant Violation**  
**Non-functioning Afterburner on Preheat Oven P002, Installing/Operating two Preheat Ovens without Permits**  
**REQUEST FOR INFORMATION regarding Boiler, Pattern Washer, Shot Blasters, Saws, Auto Belt Grinder**  
**Facility ID # 1576001589**

On April 10, 2013, the Canton City Health Department (CCHD), Air Pollution Control Division (APCD) received a complaint regarding emissions coming from Harbor Castings, Inc. Following the initial complaint investigation, Terri Dzienis, APC Administrator, and I visited the facility on July 3, 2013 for a meeting with you and a detailed tour of the facility. During the tour, we noticed several discrepancies between the equipment that is owned and operated and the air permits issued to Harbor Castings, Inc.

Below is a summary of the findings, violations, and actions that need to be addressed as a result of this investigation:

#### **Finding 1:**

The natural gas fired oven, known as the Custom brand North Oven, identified as Emission Unit (EU) P002 in Permit #P0074679, has a non-functioning afterburner. After discussing this with you, this afterburner has not been functioning for some time. This oven is used to burn residual wax out of the molds and to preheat the molds. (NOTE: This EU will be identified as N001 in future air permits, as it meets the definition of incinerator per Ohio Administrative Code (OAC) 3745-17-01(B)(9) which states *"Incinerator means any equipment...used to burn liquid, semi-solid or solid refuse or to process salvageable materials by burning..."*)

**Please Note:** On May 15, 2013, Method 9 readings were conducted to assess the visible emissions quantity of the exhaust stack for P002. At this time, the opacity was less than the applicable limit of 20% (6-minute average was 19.4%), so no violation occurred at that time.

#### **Violation:**

Failure to adhere to Permit-to-Operate (PTO) #P0074679, issued May 15, 1992, Special Terms and Conditions #2, which states that:

*"The afterburner must be operated at such times when the residual wax in the molds is being combusted."*

This is also a violation of Ohio Revised Code (ORC) 3704.05(c), which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

**Finding 2:**

There are two natural gas fired ovens (the Custom brand Southwest Oven and the Lindberg brand Southeast Oven) that were installed at Harbor Castings, Inc. and are operating without air permits. These ovens are used to burn residual wax out of the molds and to preheat the molds. These ovens do not meet the de minimis exemption listed in OAC 3745-15-05, which would not require a permit, because they are subject to the particulate emission limit listed in OAC 3745-17-09 of 0.10 lbs/100 lbs of wax charged, which limits the source to less than 10 lbs/day. There are no other applicable permit exemptions. (NOTE: These EUs will be identified as N002 and N003 in future air permits, as they meet the definition of incinerator. See note in Finding 1.)

**Violation:**

The installation and operation of an air contaminant source without an air permit is a violation of OAC 3745-31-02(A)(1)(b) which states:

*"...no person shall cause, permit, or allow the installation or modification, and subsequent operation of any new source...without first obtaining a PTIO from the director..."*

This is also a violation of Ohio Revised Code 3704.05(a), which states:

*"No person shall cause, permit, or allow emission of an air contaminant in violation of any rule adopted by the director of environmental protection..."*

**Requested Actions & Information:**

Please provide a written response (via email or regular mail) by September 13, 2013 to the following:

Compliance Plan to address above violations:

1. Provide a written compliance plan detailing the corrective actions you plan to take to provide a functioning afterburner for EU P002 in Permit #P0074679, the estimated time frames for those actions, and how you plan to prevent this violation from occurring in the future.
2. Air permit applications must be submitted for the Southeast and Southwest ovens named in Finding 2. Please respond with a date when the permit applications will be submitted. Application forms and instructions can be found at the following website: <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>

Boiler described as .84 MM BTU Natural Gas Boiler:

3. This boiler, described as EU B001 in Permit #P0074676, issued March 17, 1989, was removed from your facility in 1993. Our records indicate it was replaced with a Columbia .63 mmBtu/hr Natural Gas Boiler the same year. Provide an estimate of the removal date of EU B001 and an estimated installation date of the new boiler. Also confirm the description of the new boiler.

Pattern Washer described as Cold Cleaner, Trichlorotrifluorethane:

4. The pattern washer, described as EU L001 in Permit #P0074677, issued March 24, 1989, is no longer in use. Provide a letter confirming the shutdown of this unit with an approximate date of shutdown.

Emission Units connected to baghouses:

5. There are several pieces of equipment connected to the Dust Hog and Micro Air dust collectors that may require air permits. This office is requesting maximum Potential to Emit (PTE) calculations for the following pieces of equipment to help us determine if permits are needed:
  - a. Goff Shot Blaster (Bead Blaster Stainless Steel) connected to Dust Hog

- b. Goff Shot Blaster #1 (Bead Blaster Blue) connected to Micro Air
  - c. Goff Shot Blaster #2 (Bead Blaster Large) connected to Dust Hog
  - d. Timesaver Auto Grinder connected to Micro Air
  - e. Wallace 10 hp Chop Saw connected to Micro Air
  - f. Everett 22" Open Cut off saw connected to Micro Air
  - g. Everett 22" Box Cut off saw connected to Micro Air
  - h. Any other equipment exhausted to either dust collector that we have not already listed
- NOTE:** The definition of PTE may be found in OAC 3745-31-01(VVVV).

**Additional Information:**

A copy of the regulations cited in this letter can be retrieved from <http://codes.ohio.gov/>.

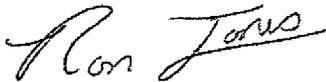
The Office of Compliance Assistance and Pollution Prevention (OCAPP) is a non-regulatory program that provides resources and information to small companies to help them comply with environmental regulations. If you require assistance completing the PTE calculations as requested in this letter, or to help determine whether air permits are needed for your company, you can call their hotline at 1-800-329-7518 or find them online at <http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>.

Please be aware that if it is determined more air permits are needed, additional violations may be cited in a separate letter.

Please note also 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. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me at 330-489-3385 or via email at [rjones@cantonhealth.org](mailto:rjones@cantonhealth.org).

Sincerely,



Ron Jones  
Air Pollution Control Engineer

Cc: Correspondence  
Bruce Weinberg, Ohio EPA Central Office, via email  
Brian Dickens, US EPA, via email