



**Environmental
Protection Agency**

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

Re: Fulton County
Glenn Hunter & Associates
Premise # 0326000074
Notice of Violation (NOV)

June 14, 2012

CERTIFIED MAIL

Mr. Glenn Hunter, Owner
Glenn Hunter & Associates
3672 County Road 6-1
Delta, Ohio 43515

Dear Mr. Hunter:

This letter shall serve as follow-up to the inspection conducted on May 25, 2012, of the Glenn Hunter & Associates (GHA) facility located at 1285 County Road 6 in Delta, Ohio (Facility ID 0326000074). The purpose of this inspection was to determine the validity of a complaint received on May 23, 2012, regarding fugitive dust emission coming from the facility. The inspection was conducted by myself and Ms. Annabella Troiano, representing the Division of Air Pollution Control (DAPC).

Based on our discussions, our observations during the inspection, and a review of the company's files, our findings are as follows:

1. Upon arrival we observed very dusty conditions around the facility, in general. While the water truck was operating and water had recently been applied to portions of the roadways, even in a relatively light wind, visible emissions were observed from the non-watered roadways and various storage piles on site. While DAPC feels this is still an issue that needs addressed, DAPC feels this issue will be addressed by the measures to be implemented as stated in the compliance plan received on May 31, 2012, in response to the NOV issued on April 24, 2012.
2. Also upon arrival, and of more significant concern, we observed visible emissions coming from an area of the facility near the middle of the building which houses the roll crusher/screener (P902). Upon inspection it was determined that the source of the visible emissions was the baghouse which serves the mixing and weighing operations (P903) and also draws from the ambient air inside the crusher/screener building. P903 has a visible emissions limit from the exhaust of this baghouse of 0% opacity as a six minute average.

3. Ohio EPA was asked not to stay in the vicinity of that unit, as the facility was reportedly conducting a tour of the facility with customers. As a courtesy, DAPC waited for the customers to leave, after which P903 was then shutdown. This did not afford us the opportunity to conduct visible emissions readings however, we are fairly certain that a violation of the visible emissions limit would have been observed had readings been conducted.
4. Approximately 25 minutes after identifying the source of the visible emissions we were able to again speak with the facility contact and have access to the facility. However, again, the areas of operation and emissions units of concern had been shut down and were not operating. At that time it was explained that, for approximately a week to a week and a half, emissions were observed coming from the stack of the baghouse serving P903. After several attempts by the maintenance staff to resolve the problem, a sufficient remedy could not be determined. It was then decided that all the bags in the baghouse would be replaced, those bags had been ordered, were being made and were expected in the next few days.

Per the general terms and conditions of number seven and number ten of the permit number P0108766, issued on December 28, 2011, and per Ohio Administrative Code (OAC) 3745-15-06(B), in this case, visible emissions from the baghouse serving P903 at levels sufficient to cause a violation constitutes a malfunction of the baghouse and requires that the company report such issues to Ohio EPA. If such a malfunction occurs for more than 72 hours, the company is required to notify Ohio EPA, in writing, of the malfunction. Neither verbal nor written notification was provided to Ohio EPA regarding this malfunction. Failure to report this ongoing malfunction is a violation of the general terms and conditions of permit number P0108766, OAC 3745-15-06(B) and a separate violation of Ohio Revised Code (ORC) 3704.05.

5. As a general observation, while the water spray bars located above the overhead doors on the building housing P902 and P903 were operational upon our inspection, they are not operating effectively for their intended purpose. The concept is for a mist to be produced in order to help reduce fugitive emissions, namely very fine particulate matter, from exiting the overhead door. The spray bars on site were producing a light trickle which is not effective. While the concept of the control method is understood and appreciated, this application is not functioning properly to achieve the desired effect. If this control method was accounted for when determining the level of control efficiency for the building during permitting of P902 and P903, this needs to be remedied immediately.

Mr. Glenn Hunter
June 14, 2012
Page 3

The company's written response to this letter is requested by July 17, 2012. It should be submitted to Ohio EPA, Northwest District Office and should contain a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future. The primary issue to be addressed is the GHA's ability to properly identify malfunctions at the facility, as identified in the applicable permits, and respond accordingly. This is the second such violation that has occurred at this facility in the last two months.

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 via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/cg

Enclosures

pc: Thomas C. Cikotte, DAPC - NWDO
Certified Mail Receipt Number 70091410000118342702

ec: William MacDowell, U.S. EPA Region V
Bruce Weinberg, DAPC - CO
Jennifer Jolliff, DAPC - NWDO
Thomas C. Cikotte, DAPC - NWDO
Mark Barber, DAPC - NWDO
Annabella Troiano, DAPC - NWDO