



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 23 2012

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jeff Krause
Director, EH&S
HA International, LLC
630 Oakmont Lane
Westmont, Illinois 60559

Re: Notice of Violation
HA International, LLC
Oregon, Illinois

Dear Mr. Krause:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to HA International, LLC (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Illinois State Implementation Plan at your Oregon, Illinois facility.

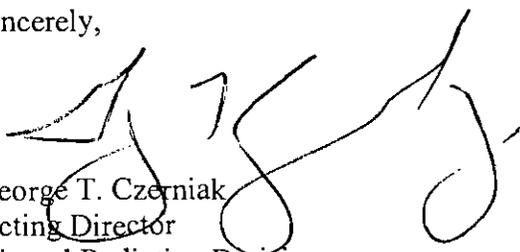
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Natalie Topinka. You may contact her at 312-886-3853 or topinka.natalie@epa.gov to request a conference. You should make the request as soon as possible, but no later than 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



George T. Czerniak
Acting Director
Air and Radiation Division

cc: Ray Pilapil, Manager
Bureau of Air, Compliance and Enforcement Section
Illinois Environmental Protection Agency

6. The Illinois SIP at 35 Ill. Admin. Code § 215.301 states that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Admin. Code §§ 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

Factual Background

7. HAI owns and operates a resin-coated sand production facility at 1449 Devils Backbone Road, Oregon, Illinois (the Oregon Facility). The Oregon Facility includes three resin-coated sand production lines (Plants 1, 2, and 3).
8. After a citizen had contacted EPA by telephone on August 26, 2011 to complain of a persistent odor from the Oregon Facility, EPA conducted an inspection of the Oregon Facility on September 28, 2011.
9. Emissions from each of the three Plants include phenol and formaldehyde, both of which are classified as volatile organic material (VOM) under the Illinois SIP at 35 Ill. Admin. Code § 211.7150 and organic material under 35 Ill. Admin. Code § 211.4250.
10. Since the formaldehyde, phenol, and other pollutants emitted by the Oregon Facility are classified as organic material, emissions from the Oregon Facility are subject to the organic material limits of no more than 8 lbs/hr from any emission source under 35 Ill. Admin. Code § 215.301 and Title V Permit condition 7.1.3.e.
11. On March 15, 2012, a citizen contacted EPA by telephone to complain of persistent odor from the Oregon Facility. The caller was not the same caller who complained of odor on August 26, 2011.
12. EPA sent a Section 114 Request for Information to HAI on November 28, 2011. The request required HAI to submit information on past permitting actions, capital and maintenance projects, and to conduct stack testing of the Oregon Facility's VOM emissions. HAI submitted a response to the Request for Information on February 1, 2012, and conducted the required stack test on April 17-18, 2012. HAI provided results of the stack test to EPA on June 1, 2012.
13. According to HAI's April 17-18, 2012 stack test and information submitted in response to the November 28, 2011 Request for Information, the Oregon Facility emits in excess of 8 lbs/hr of organic material at each of Plants 1, 2 and 3.

Violations

14. Organic material emissions from each of HAI's Plants 1, 2 and 3 are in excess of 8 lbs/hr, in violation of 35 Ill. Admin. Code § 215.301. These organic material emissions do not meet the criteria for exception under 35 Ill. Admin. Code § 215.301.

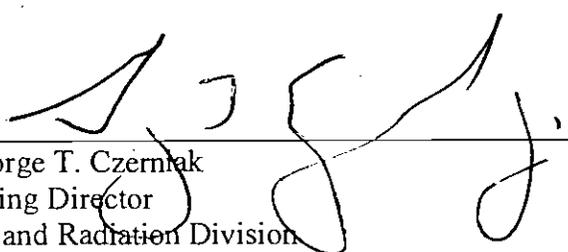
15. HAI caused or allowed the emission of VOM into the environment so as, either alone or in combination with the contaminants from other sources, to cause air pollution in Illinois, in violation of the Illinois SIP at 35 Ill. Admin. Code § 201.141.

Environmental Impact of Violations

16. These violations have caused excess emissions of VOM, including formaldehyde and/or phenol. Formaldehyde and phenol are also classified as Hazardous Air Pollutants. Formaldehyde is classified as a probable human carcinogen according to EPA's Integrated Risk Information System and a known human carcinogen according to the International Agency for Research on Cancer. Acute and chronic inhalation exposure to formaldehyde in humans can result in adverse respiratory symptoms, and eye, nose, and throat irritation. Phenol is highly irritating to the skin, eyes, and mucous membranes in humans after acute inhalation exposures. Anorexia, progressive weight loss, diarrhea, vertigo, salivation, a dark coloration of the urine, and blood and liver effects have been reported in humans that have been chronically exposed to phenol.

8/23/12

Date



George T. Czerniak
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-12-IL-16,

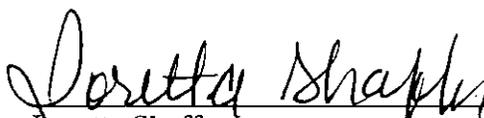
by Certified Mail, Return Receipt Requested, to:

Jeff Krause
Director, EH&S
HA International, LLC
630 Oakmont Lane
Westmont, Illinois 60559

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Ray Pilapil, Manager
Bureau of Air
Compliance and Enforcement Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794

On the 31 day of August 2012.



Loretta Shaffer
Administrative Program Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7667 6380