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

AUG 1 2 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip W. Henzler, Sr.,
Corporate Director
Bunting Bearing LLC
200-208 Van Buren Street
Delta, Ohio 43515

Re: Administrative Order EPA-5-16-113(a)-OH-17

Dear Mr. Henzler:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312) 886-6073.

Sincerely,

Shulpa Patel for Brian Dickens

Brian Dickens
Chief
Air Enforcement and Compliance Assurance Section (OH/MN)

Enclosure:

cc: Robert Hodanbosi
Ohio Environmental Protection Agency

Mark Budge
Ohio Environmental Protection Agency

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**EPA-5-16-113(a)-OH-17**
	)	
Bunting Bearing, LLC	)	**Proceeding Under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act, 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1)**
	)	
Delta, Ohio	)	
	)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to Bunting Bearing, LLC (Bunting) under Sections 113(a)(1)(A) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1)(A) and 7414(a)(1).

Statutory and Regulatory Background

2. Each state must submit to the Administrator of EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410.

3. On January 22, 2003, EPA approved Rule 3745-31-02 as part of the federally enforceable Ohio State Implementation Plan (SIP). 68 Fed. Reg. 2009 (March 10, 2003).

4. OAC Rule 3745-31-02(A)(1) states that no person shall cause, permit, or allow the installation of a new source of air pollutants or cause, permit, or allow the modification of an air contaminant source without first obtaining a permit to install from the director.

5. On January 22, 2003, EPA approved Rule 3745-31-05(D) as part of the federally enforceable Ohio State Implementation Plan (SIP). 68 Fed. Reg. 2909 (March 10, 2003).

6. OAC Rule 3745-31-05(D) states that the director may impose such special terms and conditions as are appropriate or necessary to ensure compliance with the applicable laws and to ensure adequate protection of environmental quality. Special terms and conditions necessary to ensure compliance with requirements mandated by the Federal Clean Air Act or regulations promulgated by the administrator shall be federally enforceable and designated as such in the permit.

7. On October 29, 2012, the State of Ohio issued Bunting a Final Permit to Install and Operate (PTIO Number P0108083) related to Baghouses A, B, and C at its non-ferrous foundry located at 200-208 Van Buren St., Delta, Ohio ("Van Buren Facility").

8. PTIO Number P0108083 states that "the permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term 'fabric filter bag leak detection system' means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm set points, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition."

9. The PTIO Number P0108083 states that "at a minimum, the permittee shall maintain the bag leak detection system in accordance with the following requirements:

a. keep onsite the necessary parts for routine repairs of the monitoring equipment;

b. keep records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests; and

c. conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance."

10. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP permit. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

11. The Administrator of EPA may require any person who owns or operates an emission source to make reports; install, use and maintain monitoring equipment; sample emissions; provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

12. Bunting owns and operates a non-ferrous foundry at 200-208 Van Buren Street, Delta, Ohio. Emissions from the non-ferrous foundry are controlled by Baghouses A, B, and C.

13. Emissions from Bunting's non-ferrous foundry's Baghouses A, B, and C are subject to the monitoring requirements in the Ohio SIP at 3745-31-05(D) specified in Conditions 1.d.2, 2.d.2, 3.d.2, 1.d.3, 3.d.3, and 3.d.3 of PTIO Number P0108083 (as quoted in paragraph 8 and 9 above).

14. Bunting owns or operates an "emission source" as that term is used in Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1).

15. Bunting is subject to the requirements of Section 114(a)(1).

16. On April 17, 2015, EPA issued to Bunting a Notice of Violation (NOV) alleging that it violated the Ohio SIP by failing to install and operate a bag leak detection system (BLDS) as required by PTIO Number P0108083.

17. On June 1, 2015, representatives of Bunting and EPA discussed the April 17, 2015 NOV.

18. Bunting did not calibrate the CPM 5000 systems installed on the stacks of Baghouses A, B, and C.

19. Bunting did not have the manufacturer's certification that the CPM 5000 systems installed on the stacks of Baghouses A, B, and C were capable of detecting particulate emissions.

20. Bunting did not continuously monitor and record the output signal from the sensor for the CPM 5000 units installed on the stacks of Baghouses A, B, and C.

21. Bunting's CPM 5000 units were not equipped with an audible alarm system that will alarm when an increase in relative particulate emissions loading is detected over a preset level.

22. Bunting's CPM 5000 units were not programmed with present levels in order to detect an increase in relative particulate emissions loading.

23. Bunting did not establish a baseline output for each CPM 5000.

24. Bunting did not establish the alarm set points or the alarm delay times for each CPM 5000.

25. Bunting's CPM 5000 units did not have an operations, maintenance, and monitoring plan.

26. Bunting's CPM 5000 unit for Baghouse A was not in operation from February 2014 through December 2014 due to lack of parts needed for routine repairs of the monitoring equipment.

27. Bunting did not conduct monthly QA checks of baghouse leak detection systems.

28. As described in paragraphs 18 through 27 above, Bunting failed to comply with the Conditions set forth in PTIO Number P0108083 in violation of its permit and the Ohio SIP.

Compliance Program

29. Within one year of the effective date of this Order, Bunting must achieve, demonstrate and maintain compliance with the Ohio SIP and its PTIO cited above at its Van Buren facility.

30. Within 14 days of the effective date of this Order, Bunting must install, calibrate, and begin to operate a bag leak detection system (BLDS), in accordance with the system manufacturer instructions, on Baghouses A, B and C as follows:

a. The BLDS must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.

b. The BLDS sensor must provide output of relative PM loadings. You must continuously record the output from the BLDS using electronic or other means (e.g., using a strip chart recorder or a data logger).

c. The BLDS must be equipped with an alarm system that will sound when the system detects an increase in relative particulate loading over the alarm set point and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. In the initial adjustment of the BLDS, Bunting must establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.

e. Following initial adjustment, Bunting must not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority (which, at the time of this ACO is the Ohio Environmental Protection Agency, Northwest District Office), except as provided in paragraph f. below.

f. Bunting may adjust the sensitivity of the BLDS to account for seasonal effects, including temperature and humidity, according to the procedures identified in the facility preventative maintenance plan (PMP, as identified at paragraphs C.1.g, C.2.g., and C.3.g. of the PTIO).

g. Bunting must install the bag leak detection sensor downstream of the fabric filter.

h. Bunting must keep onsite the necessary parts for routine repairs of the monitoring equipment.

31. Within 45 days of the effective date of this Order, Bunting must submit a project completion report to document that the BLDS meets the requirements and procedures in paragraph 30, above.

32. Within 60 days of the effective date of this Order, Bunting must revise a site-specific PMP, as it pertains to the BLDS. Bunting must operate and maintain each BLDS according to the plan at all times. The PMP must describe the items below:

a. Installation of the BLDS;

b. Initial and periodic adjustment of the BLDS, including how the alarm set-point and alarm delay time will be established;

c. Operation of the BLDS, including quality assurance procedures identified in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance at Section 6.0;

d. How the BLDS will be maintained, including a routine maintenance schedule and spare parts inventory list;

e. How the BLDS output will be recorded and stored; and

f. Corrective action procedures, which should determine the cause of every alarm from a BLDS within 1 hour of the alarm and alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are appropriate. Corrective actions may include, but are not limited to, the following:

    i. Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;

    ii. Sealing off defective bags or filter media, if practical;

iii. Replacing defective bags or filter media, or otherwise repairing the control device, in a period of time that is customary to allow identification of steps necessary to replace, design, deliver, and install the device;

iv. Sealing off a defective fabric filter compartment; or

v. Cleaning the BLDS probe, or otherwise repairing the BLDS.

Bunting may take more than 3 hours to alleviate a specific condition that causes an alarm if it identifies in the PMP the specific condition as one that could lead to an alarm, adequately explain why it is not feasible to alleviate this condition within 3 hours of the time the alarm occurs, and demonstrate that the requested time will ensure alleviation of this condition as expeditiously as practicable.

33. Within 90 days of the effective date of this Order, Bunting must arrange for the BLDS manufacturer's certified trainer to train the operators responsible for the BLDS maintenance and monitoring at the Van Buren Facility.

34. Within 14 days of the completion of the PMP, Bunting must submit the plan to EPA email for approval.

35. Within 30 days of receiving EPA approval of the PMP, Bunting must provide a copy of the PMP to the delegated State regulatory agency and train its BLDS operators to implement the PMP.

36. Bunting will provide confirmation of training on the BLDS, referred to in Paragraph 33 above, to EPA within 30 days of completion.

37. Bunting must keep onsite the necessary parts for routine repairs of the monitoring equipment as specified in the PMP.

38. Within 14 days of completion of any training referenced in this Order, Bunting must provide to EPA a list of names of employees who completed the training, the name of the training and the date.

39. Bunting must keep records of the date, time, and duration of each alarm and BLDS malfunction, the time corrective action was initiated and completed, and a brief description of the cause of the alarm or BLDS malfunction and the corrective action taken. These records must be maintained as required by the PTIO.

40. Bunting must provide EPA with information demonstrating their continued compliance with its PTIO and the terms of this ACO as an attachment to Bunting's quarterly deviation report requirement in its PTIO.

a. Bunting must submit the quarterly deviation reports (i.e. postmarked) by the following dates:

   i. October 31, 2016;

   ii. January 31, 2017;

   iii. April 30, 2017;

   iv. July 31, 2017;

   v. October 31, 2017;

   vi. January 31, 2018;

   vii. April 30, 2018; and

   viii. July 31, 2018.

b. Bunting must include records of the date, time, and duration of each alarm and BLDS malfunction, the time corrective action was initiated and completed, and a

brief description of the cause of the alarm or BLDS malfunction and the corrective action taken in each attachment to the quarterly report.

41. Bunting must conduct performance testing of Baghouses A, B, and C under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1) as described in Appendix A incorporated by reference into this Order, and in accordance with the provisions of its PTIO.

42. Bunting must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

or

R5airenforcement@epa.gov;

and

Ohio Environmental Protection Agency
Northwest District Office
347 N. Dunbridge Road
Bowling Green, Ohio 43402

General Provisions

43. This Order does not affect Bunting's responsibility to comply with other federal, state and local laws.

44. This Order does not restrict EPA's authority to enforce the Ohio SIP or any other section of the CAA.

45. Nothing in this Order limits the EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for Bunting's violation of the Ohio SIP.

46. Failure to comply with this Order may subject Bunting to penalties of up to $37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

47. The terms of this Order are binding on Bunting, its assignees and successors. Bunting must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

48. Bunting may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Bunting fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

49. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action. To aid in our electronic recordkeeping efforts, please furnish an electronic copy of all deliverables on a compact disk, flash drive or other similar item.

50. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

51. Bunting agrees to the terms of this Order but does not admit the factual allegations herein.

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52. This Order is effective on the date of signature by the Director of the Air and Radiation Division.

53. This Order will terminate no less than two years from the effective date and upon EPA's approval of Bunting's certification that it has satisfied all terms of the Order throughout its duration.

7/28/16
Date

Philip W. Henzler, Sr., Corporate Director
Bunting Bearing

8/11/16
Date

Edward Nam
Acting Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Appendix A

Bunting must submit the following information and conduct emission testing in accordance with the following schedule:

Submit Testing Protocol(s)	Within 30 days of the effective date of this Order
Submit Notification of Intent to Test	No less than 21 days before testing
Conduct emissions Testing	No later than 65 days of the effective date of this Order
Submit Final Testing Report	No later than 30 days after completion of the emission testing

1. Bunting must submit to EPA and the Ohio Environmental Protection Agency (OEPA) a proposed testing protocol within 30 days of the effective date of this Order. The testing protocol must completely describe the methods and procedures to be used for the emissions testing required by this request. The testing protocol must also address the requirements of Paragraph 3 below.

2. Bunting must submit to EPA and OEPA a notification of intent to test no less than 21 days before performing the emissions testing. The intent to test must identify the dates, times, methods to be used, and other relevant information related to the emissions testing required.

3. Bunting must conduct initial emission tests for particulate matter (PM) and lead (Pb) at Baghouses A, B, and C no later than 65 days after the effective date of this Order. The emissions tests must, at a minimum, be conducted under conditions that represent the maximum source operating rate. Additionally, the initial emissions testing must meet the requirements identified below.

    a. Emissions testing must be conducted at the outlet of each baghouse. Emissions testing must be conducted using EPA Reference Methods below:
        i. Methods 1-4 of 40 C.F.R. Part 60, Appendix A
        ii. Method 29 of 40 C.F.R. Part 60, Appendix A for Pb
        iii. Method 5 of 40 C.F.R. Part 60, Appendix A for PM
        iv. Method 9 of 40 C.F.R. Part 60, Appendix A for opacity
    b. Each emissions test must consist of at least three, one-hour runs.
    c. Each emissions test must be conducted while all emission units routed to each baghouses are in operation.
    d. Each emissions test must comply with the Bunting's PTIO Number P0108083 Condition f.1.d for Baghouses A, B, and C.
    e. Each emission test must be conducted while all emissions from all routed emission units are being directed to each respective baghouse.
    f. Each emissions test must quantify the mass emission rate of PM and Pb in the outlet stream of each baghouse in both pounds per hour (lb/hr) and grains per dry standard cubic feet (gr/dscf).
    g. Bunting must monitor and record the pressure drop across each baghouse at least once every 15 minutes during the entirety of each emissions test.

4. Bunting must submit a final report for the testing no later than 30 days after completion of the emissions testing. The final report must include, at a minimum, the information identified below.

a. Summary of Results

i. Results of the above specified emissions tests;

ii. Process and control equipment data related to operation and determining compliance;

iii. Discussion of test errors;

iv. Discussion of any deviations from the reference test methods;

v. Production data; and

vi. Calculation of an appropriate range for each parameter within which emissions testing demonstrates compliance with applicable PM and Pb emission rates.

b. Emission Unit Operations

i. Description of the process and control equipment in operation;

ii. Operating parameters of each baghouse and its related equipment at the time of the test, including but not limited to, differential pressure; and

iii. Description and amounts, in pounds, of all raw materials used in each emission unit during the test; including the amount the Pb content of the material.

c. Sampling and Analytical Procedures

i. Sampling port location(s) and dimensions of cross-section;

ii. Sampling point description, including labeling system;

iii. Brief description of sampling procedures, including equipment and diagram;

iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;

v. Brief description of analytical procedures, including calibration;

vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and

vii. Quality control/ quality assurance procedures, tests and results.

d. Appendix

i. Complete results with example calculations using data obtained during the emissions test;

ii. Raw field data (original, not computer printouts);

iii. Laboratory report, with signed chain-of-custody forms;

iv. Calibration procedures and results;

v. Raw process and control equipment data, signed by plant representative;

vi. Test log;

vii. Project participants and titles; and

viii. Related correspondence.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-OH-17, by certified mail, return receipt requested, to:

Philip W. Henzler, Sr.,
Corporate Director
Bunting Bearing LLC
200-208 Van Buren Street
Delta, Ohio 43515

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-OH-17, by first-class mail to:

Mark Budge, APC Manager
Ohio Environmental Protection Agency
Northwest District Office
347 N. Dunbridge Road
Bowling Green, Ohio 43402

On the 15th day of August 2016.

Kathy Doe
for Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7646 9517