



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Horsburgh & Scott, Cleveland, Ohio

FROM: Brianna Fenzl, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Horsburgh & Scott

Facility Location: 5114 Hamilton Avenue, Cleveland, Ohio

Date of Inspection: April 23, 2024

EPA Inspector(s):

1. Brianna Fenzl, Environmental Engineer
2. Charles Hall, Environmental Engineer

Other Attendees:

1. Andrew Pauken, Maintenance Manager
2. Rodie Zcevic, Maintenance Employee
3. Jacob Stringfield, Paint Booth Operator
4. David Turner, Assembly Manager

Contact Email Address: amp@horsburgh-scott.com

Purpose of Inspection: To determine compliance with Ohio Permit-to-Install and Operate (PTIO)

Facility Type: Gear and Gearbox Manufacturer

Regulations Central to Inspection: Ohio PTIO

Facility Name: Horsburgh & Scott
Facility Location: 5114 Hamilton Avenue, Cleveland, Ohio
Date of Inspection: April 23, 2024

Arrival Time: 8:30 AM
Departure Time: 10:12 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet *Provided via email after inspection.*
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Horsburgh & Scott unless otherwise noted.

Process Description:

Horsburgh & Scott is a manufacturer of gears and gearboxes. Throughput varies due to customer demand. Metal is forged, then forgings are grinded, welded, shaped, and painted if needed. Gears are painted in a three-walled paint booth. Horsburgh & Scott's PTIO requires the facility to use a dry filtration system for the control of particulate emissions when the paint booth is in use. The paint booth has a wall of fiberglass and cotton filters that are changed out depending on use. An air blower pulls air from the inside of the booth out and through the filters. Horsburgh & Scott uses all water-based paint and paint usage is tracked by the safety director. Paint usages are then used to track volatile organic compounds (VOCs), as required by Horsburgh & Scott's PTIO. There is a carburizing furnace down the street from the main facility that is used to heat-treat and harden approximately one-third of gears. The gear is heated while carbon gas is injected into the furnace.

Staff Interview:

Horsburgh & Scott operates 24 hours a day, 7 days a week with approximately 200 employees. A third-party consultant, the Dell Group, is used by the facility for its emissions tracking and compliance.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA toured the facility and observed the paint booth, paint booth filters and vent, gear manufacturing (grinding, welding, shaping) process units, and final packaging area.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Facility Name: Horsburgh & Scott
Facility Location: 5114 Hamilton Avenue, Cleveland, Ohio
Date of Inspection: April 23, 2024

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Daily spray paint usage log

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Safety Data Sheet's for paints used
- Last year of VOC emissions calculated at paint booth
- Inspection log of filter change outs at paint booth

DIGITAL SIGNATURES

Report Author: BRIANNA FENZL  Digitally signed by
BRIANNA FENZL
Date: 2024.06.13
17:39:49 -05'00'

Section Supervisor: NATHAN FRANK  Digitally signed by
NATHAN FRANK
Date: 2024.06.17
14:18:45 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

Facility Name: Horsburgh & Scott
Facility Location: 5114 Hamilton Avenue, Cleveland, Ohio
Date of Inspection: April 23, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Charles Hall

Archival Record Location: AECAB Library >
Enf_HorsburghScott_OH_24 > Inspection Photos

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	P4230248.JPG	4/23/2024, 8:46 AM CST	Paint booth
2	P4230249.JPG	4/23/2024, 8:46 AM CST	Paint booth filter wall
3	P4230250.JPG	4/23/2024, 8:47 AM CST	Duct work behind paint booth
4	P4230251.JPG	4/23/2024, 8:59 AM CST	Crane inside facility