



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: APR 04 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Mull Iron, Rittman, Ohio

FROM: Gina Harrison, Environmental Scientist
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Mull Iron

Facility Location: 10 Mull Drive, Rittman, Ohio 44270

Date of Inspection: February 4, 2019

Lead Inspector(s):

1. Gina Harrison, Environmental Scientist

Other Attendees

1. Chet Mull III, Vice President/General Manager, Mull Iron
2. Char Dine, Air Emissions Consultant, Dinecomply, Inc.

Contact email address: chet3@mulliron.net

Purpose of Inspection: Determine facility compliance with the facility's permit, the Ohio State Implementation Plan and potential area source NESHAP applicability.

Facility Type: Structural Steel Fabricator

Regulations Central to Inspection: Ohio Permit P0116695, Ohio State Implementation Plan, 40 C.F.R. Part 63, Subpart XXXXXX

Arrival Time: 1:35 PM EDT

Departure Time: 3:55 PM EDT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from either Chet Mull III or Char Dine.

Company Ownership: The facility has always been Mull Iron.

Process Description:

Mull Iron is a structural steel fabricator, producing very large structural steel for schools, bridges, and large buildings, including recently the Pro Football Hall of Fame. The facility began operating in 1982 and currently employs 95 people. Mull Iron purchases steel shapes from Nucor and unloads them in the receiving area of the yard attached to the manufacturing building. Mull Iron personnel then bring the steel shapes to the machine shop where they are cut into smaller pieces and welded, then painted according to each project's specifications.

The facility operates 10 welding machines uses welding process type GMAW (gas shielded), and welding wire type "outershield 71M." Typically the shifts are 8 hours long, six days per week, around 50 weeks per year, for a total of 2400 hours per year.

The general process flow is:

Steel shapes >> machine shop cutting >> tack welding plates >> additional steel material taken off to be welded (spot-welded or finish-welded) >> paint area

Staff Interview: According to Mr. Mull, the facility retains a consultant (Char Dine) to perform emission calculations and keep records of welding and paint usage. Mr. Mull contacted Ms. Dine and requested that she send Ms. Harrison analysis of potential NESHAP applicability.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: Ms. Harrison observed machining and welding operations and the paint booth area. The paint booth was not operating during the inspection.

The facility tracks paint usage monthly. Ms. Harrison requested copies of the facility's annual paint usage, including HAP content, for 2017 and 2018.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Records were not reviewed on site during the inspection.

CLOSING CONFERENCE

Ms. Harrison thanked Mr. Mull and Ms. Dine for their time and told them she would send a copy of the inspection report by email when it was completed. We confirmed that nothing we had discussed was Confidential Business Information. Ms. Harrison stated that EPA may issue a Section 114 Information Request or follow up with questions via phone or email.

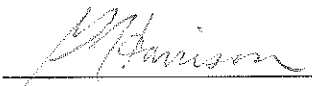
Requested documents: Requested documents were submitted via email from Char Dine on February 4, 2019.

- Mull Iron 02-85-02-0433 Rule Applicability Determination, Welding Operations – an analysis of potential applicability of NESHAP Subpart XXXXXX.
- Monthly Cleanup Record Keeping, Rolling 12-Month OEPA Calculations.

Compliance Assistance: General compliance assistance was provided by discussing potential applicability of the NESHAP Subpart XXXXXX.

Concerns: Apart from discussing the NESHAP and its potential requirements, no additional concerns were shared with the facility at the time of the inspection.

SIGNATURES

Report Author:  Date: 4/2/19

Section Chief:  Date: 4/4/19