



Environmental  
Protection Agency

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

Re: Williams County  
Rimm-Kleen Systems  
Notice of Violation (NOV)

November 4, 2011

CERTIFIED MAIL

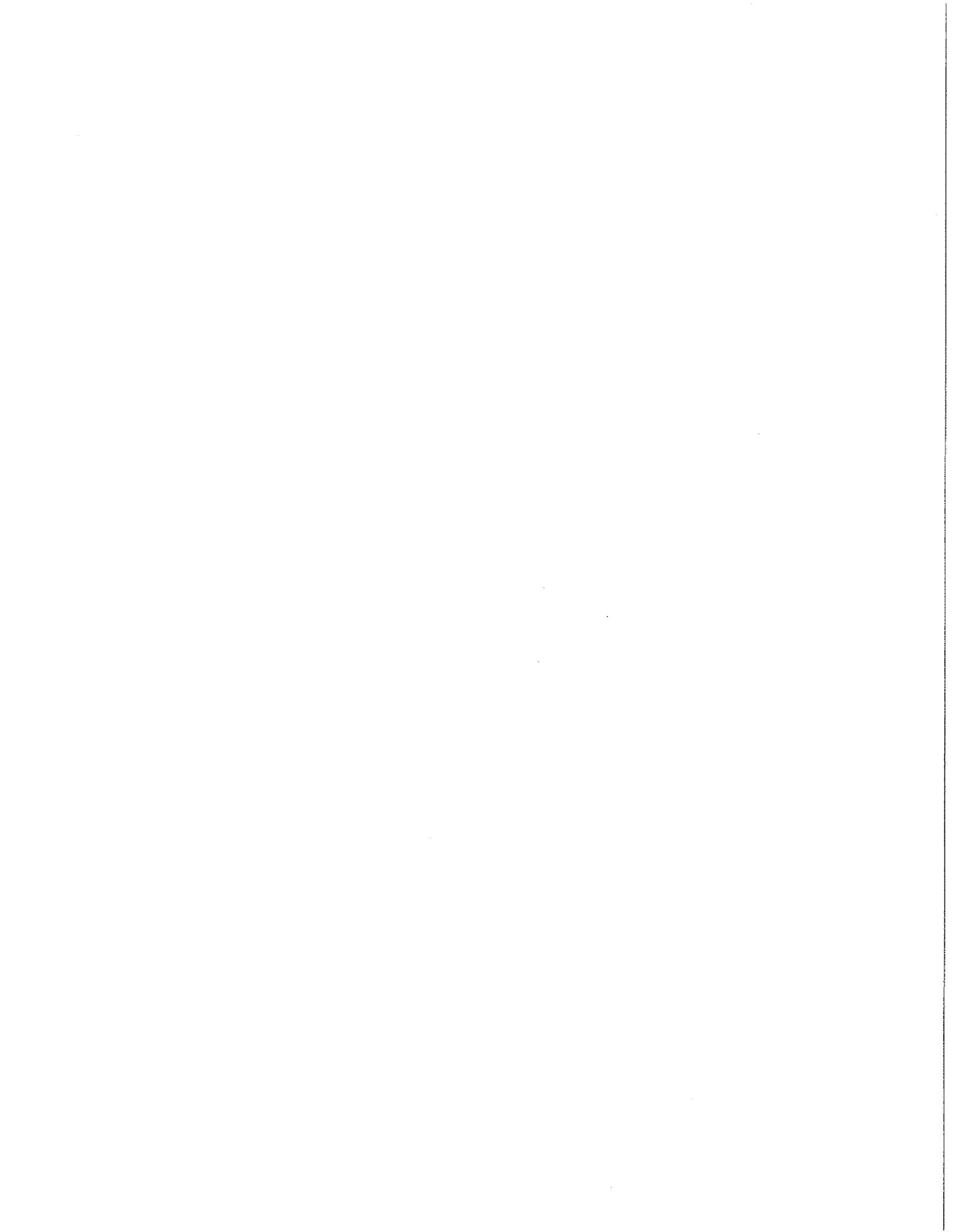
Mr. Robert Warmingham, CEO – President  
Rimm-Kleen Systems  
503 North Parkway  
West Unity, Ohio 43570

Dear Mr. Warmingham:

This letter shall serve as a follow-up to the complaint investigation that I conducted on July 12, 2011, at the Rimm-Kleen facility in West Unity, Ohio. On July 5, 2011, the Ohio Environmental Protection Agency's (Ohio EPA) Division of Air Pollution Control (DAPC) received a complaint regarding the use of a burn-off oven at the facility that generated a bad smell. I inspected the Rimm-Kleen facility to investigate the odor complaint and to determine the compliance status of all air contaminant sources operating at the facility with rules and regulations of the Division of Air Pollution Control (DAPC).

Based on our discussion and my observations during the inspection, the findings are as follows:

1. Rimm-Kleen operates two powder-paint coating booths (one for primer and one for top coat), two curing ovens, two shot blasters and a paint burn-off oven with afterburner (850,000 BTU Controlled Pyrolysis Cleaning Furnace) at its facility.
2. None of the operations at this facility have had an application filed for a Permit to Install and Operate (PTIO).
3. The two powder-paint coating booths use cartridge filters to capture particulate, and the filters exhaust inside the building. These units are not subject to DAPC regulation because they do not exhaust to the atmosphere, and there are no fugitive emissions.
4. The two curing ovens exhaust inside the building. The ovens employ heating units to cure the paint. Please provide documentation on the rating of each of the ovens in MMBTU/hour, type of fuel used to fire the ovens, and operating schedule of the ovens (i.e., eight hours per day and five days per week).



This information will be used to make a determination of whether or not a PTIO is required for these ovens.

5. The two shotblast units use cartridge filters that exhaust inside the building. An exemption from permitting exists for abrasive blasting (shotblast) operations [see OAC 3745-31-03(A)(1)(y)]:

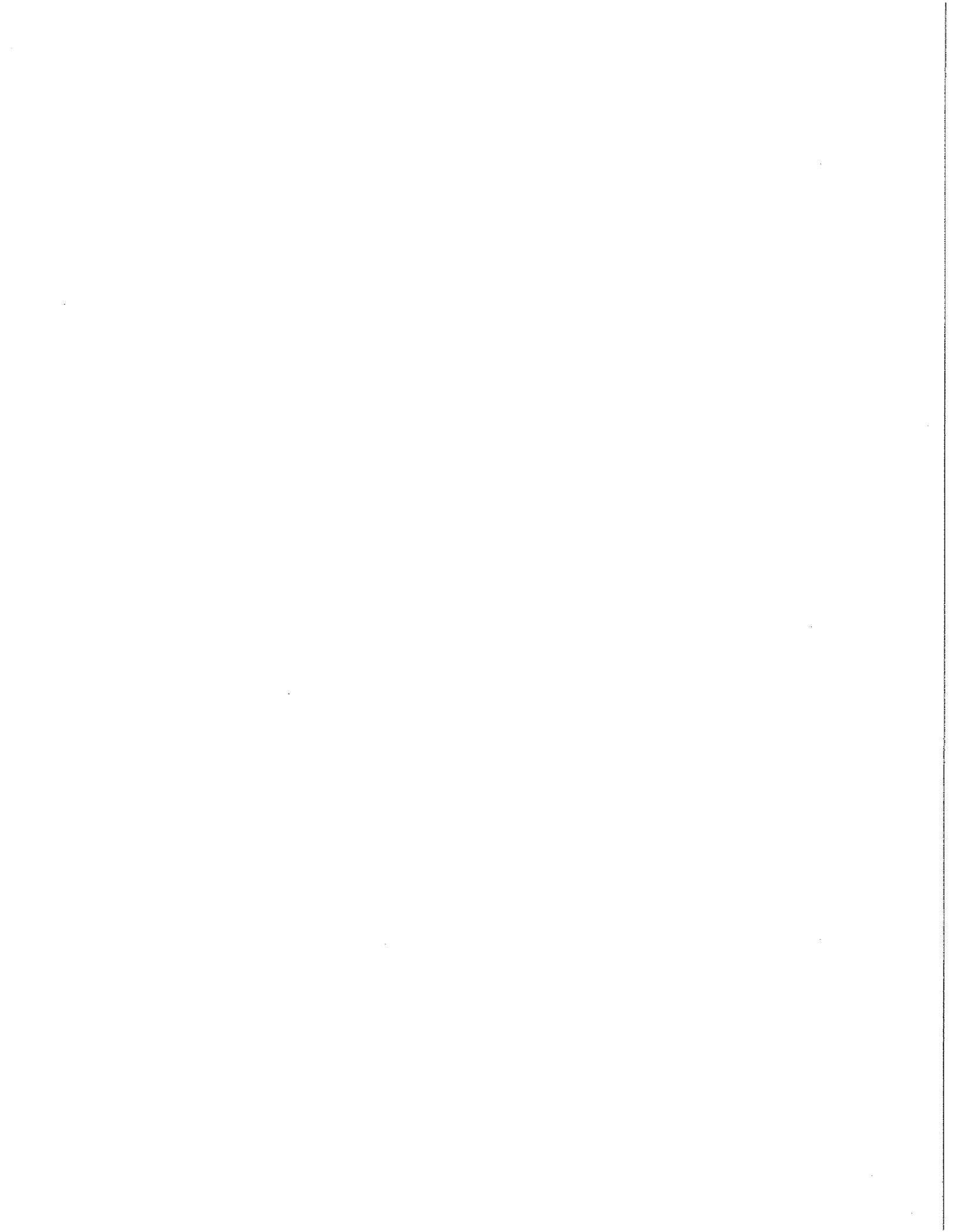
*controlled with a fabric filter designed to emit not more than 0.03 grains of particulate per dry standard cubic foot of exhaust gas with less than four thousand actual cubic feet per minute volume, venting inside a building, and emitting less than ten pounds per day of nonparticulate matter air contaminants.*

Please provide documentation on the efficiency rating of the cartridge filters, the air flow of the filters, and the emission rate of any nonparticulate matter. This information will be used to make a determination of whether or not a PTIO is required for the two shotblast units.

6. The burn-off oven is new and was installed without first obtaining a Permit to Install and Operate (PTIO) which is a violation of OAC Rule 3745-31-02(A) and ORC 3704.05. In order to correct this violation, Rimm-Kleen is required to submit a completed PTIO application and emissions activity category (EAC) form for the paint burn-off oven. A blank PTIO application and respective emissions activity category (EAC) forms are enclosed with this letter. Also required are emissions calculations and a process flow diagram to aid the processing of the application.

The information requested above must be submitted to the attention of Ms. Julie Budge (419) 373-3132 in this office by **December 9, 2011**.

Ohio EPA has a Small Business Assistance office. This office may be able to assist you in determining compliance with the rules and regulations of DAPC. You can find additional information on this office at their website at <http://www.epa.ohio.gov/ocapp> or by calling the Office of Compliance Assistance and Pollution Prevention (OCAPP) at 1-800-329-7518. The OCAPP representative at this office is Mr. Ron Nabors and can be contacted at (419) 373-3147 or at [ron.nabors@epa.ohio.gov](mailto:ron.nabors@epa.ohio.gov). 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.



Mr. Robert Warmingham, CEO – President  
November 4, 2011  
Page 3

If you have any questions or comments concerning this letter, you can contact me at [carol.norman@epa.state.oh.us](mailto:carol.norman@epa.state.oh.us) or by phone at (419) 373-3141.

Sincerely,



Carol Norman, PhD, PE  
Division of Air Pollution Control

/lr

Enclosure

pc: Tom Kalman, DAPC CO  
William MacDowell, US EPA Region 5  
Certified Mail Receipt Number 7009 1410 0001 1834 0128

ec: Jennifer Jolliff, NWDO DAPC  
Julie Budge, NWDO DAPC  
Ron Nabors, NWDO DAPC  
Carol Norman, NWDO DAPC

