



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

**CERTIFIED MAIL**

December 15, 2008

Mr. Terry Coleman  
Airstream, Inc.  
419 West Pike Street  
Jackson Center, Ohio 45334

**NOTICE OF VIOLATIONS**

Mr. Coleman;

Thank you for your cooperation during our inspection on November 25, 2008. The purpose of the facility inspection was to observe and evaluate compliance with Federal and State air pollution control regulations. The inspection was carried out by Madhava Rao Dasari, George Nemore, and Terry Sanner, of this office.

The purpose of this letter is to convey ongoing concerns to you that have been identified during repeated compliance inspections. Since June 10, 2004, this office has sent a Notice of Violation (NOV), Warning Letters, conducted numerous phone conversations and have had meetings with Airstream and/or their consultants in an attempt to correct the on-going record keeping problems.

Based on our November 25, 2008, Airstream Inc continues to fail to adequately maintain proper records on the coating operations at Airstream's Jackson Center, facility. These failures constitute violations of Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) which requires appropriate records be maintained and any deviations be reported.

In order to assure quick response to these record keeping violations and assure that there have not been any emissions exceedances, please submit the following information to this office by January 20, 2008:

- A review of each coating operation's rolling 12-month period coating and cleanup usage, as well as, the calculated volatile organic compound (VOC) emissions for the last 12 months;
- Documentation on the type and VOC content of coatings and liquid organic cleanup materials employed in emissions units K002, K003, K004, and K006, each;
- A report of any and all deviations from the rolling 12 month VOC emission limitation(s) and/or VOC content limitations per emissions unit; and

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- **A compliance plan for modifying and maintaining the required records.**

**A review of each coating operation rolling 12-month period:**

In Airstream's Title V permit, P0088832, that was issued final on October 24, 2008, and their PTI's, each of the metal coating operations have a number of rolling 12-month limitations:

- K002, Spray Booth Building 103 West, has the following rolling 12-month limitations;
  - The VOC emissions shall not exceed 16.85 tons;
  - Coating usage shall not exceed 8,760 gallons; and
  - Liquid organic cleanup material usage shall not exceed 1,000 gallons.
- K003, Spray Booth Building 103 East, has the following rolling 12-month limitations;
  - The VOC emissions shall not exceed 16.85 tons;
  - Coating usage shall not exceed 8,760 gallons; and
  - Liquid organic cleanup material usage shall not exceed 1,000 gallons.
- K004, Chassis Paint Line - Building #103, has the following rolling 12-month limitations;
  - The VOC emissions shall not exceed 16.2 tons;
  - Coating usage shall not exceed 8,580 gallons; and
  - Liquid organic cleanup material usage shall not exceed 360 gallons.
- K006, Paint Spray Booth for window parts in Building 103, has the following rolling 12-month limitations;
  - The VOC emissions shall not exceed 6.77 tons;
  - Coating usage shall not exceed 3,000 gallons; and
  - Liquid organic cleanup material usage shall not exceed 1,000 gallons.

These limits are federally enforceable and establish synthetic potential emissions from these operations. The failure to maintain proper records to demonstrate compliance with these limitations could call into question the appropriateness of the limitations and a review of additional State and/or Federal air pollution regulations that may now apply.

In your review of the 12 month period ending November 30, 2008, this office will need each of the above limitations reviewed. If your records are unable to adequately document a limitation, please address that in your response. Your response should provide the best available estimate for any limitation that cannot be demonstrated and the methodology for establishing the estimate.

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**Documentation on the coatings and liquid organic cleanup materials:**

- K002, K003, and K006 are limited to:
  - VOC content of coating shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents; and
  - VOC content of liquid organic cleanup materials employed shall not exceed 3.04 pounds per gallon.
  
- K004 is limited to:
  - VOC content of coating shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents; and
  - VOC content of liquid organic cleanup materials employed shall not exceed 6.76 pounds per gallon.

The federally enforceable limits are also based on material limitations that Airstream has accept in their air pollution permit. Based on the records that we reviewed during our Nov. 25<sup>th</sup>, inspection it was unclear if the material that was being used actually complied with the above limitation. Like the troling 12-month limitations, these limits are federally enforceable and establish synthetic potential emissions from these operations.

In your response please submit a list of each coating and liquid organic cleanup material employed on each specific emissions unit. This should include any data sheets, such as material safety data (MSD) sheets, which document the VOC content of the coating and/or liquid organic cleanup material employed.

**Deviation reports:**

Airstream is required to submit monthly deviation(s) reports of any use of non-complying coating and annual reports on any VOC emission exceedances. During the inspection, it was unclear if the present record keeping methods would be able to properly identify these exceedances. Therefore, please submit a report of any and all exceedances that are discovered during your review of the above data. Your report should include which emissions unit had the exceedance, which limitation was exceeded, the exceedance duration, and what the overall emission increase was.

**A compliance plan for modifying and maintaining the required records:**

Since Mr. Phil Hinrichs NOV sent to Airstream in June 10, 2004, there has been a steady communication between Airstream and this office on numerous failures to properly maintain operational records and understand permit limitations and requirements. It is imperative that Airstream establishes and maintains records as required by it Title V permit. To assure that proactive steps are taken in order to quickly resolve any outstanding record keeping problems, this office will need a compliance plan submitted by January 20, 2009.

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In your compliance plan, Airstream will need to submit both a short term method that will be put into practice immediately to assure short term compliance and a long term system that will assure future compliance and demonstrate understanding of the individual permit limitations for each emissions unit.

Please be aware that this investigation will be sent to our Central Office for further review and possible enforcement action. The Ohio EPA reserves the right, pursuant to Chapters 3704, 3714, 3734, 3745, and 3750 of the Ohio Revised Code and any other applicable state or federal laws or regulations to seek civil and/or criminal action, reimbursement of response costs and any other appropriate legal or equitable relief for any violation of law.

If you have any questions or comments, please feel free to contact myself at (937) 285-6110 or Craig Osborne (937) 285-6063

Sincerely,

*M. R. Dasari*

Madhava Dasari  
Division of Air Pollution Control

cc: ~~Tom Schneider, DAPC, SWDO~~  
Jim Orleans, DAPC.CO  
Lisa Holster U.S. EPA, Region V

MD/plh