



State of Ohio Environmental Protection Agency

Southwest District

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**CERTIFIED MAIL**

December 12, 2007

Mr. Terry Coleman  
Airstream, Inc.  
419 West Pike Street  
P.O. Box 629  
Jackson Center, Ohio 45334

**Notice of Violation**

**RE: Coating usage record keeping exceedances, in emissions unit K006, (Window Frame painting), possible exceedances of the volatile organic compound (VOC) content limitation in both emissions units K002 and K003, (Spray Booth West and Spray Booth East), and failure to properly maintain records on the materials employed in each of the above mentioned three coating operations.**

Dear Mr. Coleman:

The purpose of this letter is to convey a concern to you that has been identified during our compliance inspection on November 27, 2007.

The areas of concern are:

- The record keeping for emissions unit K006 indicate that the daily coating usage exceeded the allowable 10 gallon per day usage limitation as established under its Best Available Technology (BAT) determination and requirements of Ohio Administrative Code (OAC) rule 3745-21-09(U)(2)(e)(iii);
- The possible employing of high VOC coating in both emissions units K002 and K003 in exceedance of their Best Available Technology (BAT) determinations and requirements of Ohio Administrative Code (OAC) rule 3745-21-09(U)(1)(c); and
- The failing to properly record the actual material usages in emissions units K002, K003, and K006 as required in their air pollution permits.

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**Window Frame Coating Usage and Records for emissions unit K006:**

Based on the review of Airstreams records, there appears to be exceedances of the 10 gallon per day usage limitation, which constitutes a violations of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-31-05(A)(3). Although some of the coatings may have been used in emissions units K002 and/or K003, your records indicate exceedances of your allowable daily usage in emissions unit K006. Airstream must take immediate steps to modify your record keeping procedures to only record the actual materials that are employed in emissions unit K006 and submit a report that demonstrate the corrective steps taken.

**VOC content of the "Window Frame" Coatings and the VOC content limitations for emissions units K002 and K003:**

Based on the information available to this office, the VOC content of the "Window Frame" coatings employed at your facility, is greater than the 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents. If the VOC content of the coating employed in emissions units K002 and K003 was above the 3.5 pounds per gallon, excluding water and exempt solvents, when coating the "Window Frames", that coating operation would constitute violations of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(A)(3). Airstream must review the "Window Frame" coating operations in emissions units K002 and K003 and submit a report to this office that includes the following information:

- the date(s) the "Window Frame" coating was conducted other than in emissions unit K006;
- the location(s) where the "Window Frame" coating was employed, other than in emissions unit K006, (example K002, K003, etc...);
- the amount of "Window Frame" coating employed, other than in emissions unit K006; and
- the VOC content of the "Window Frame" coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; employed, other than in emissions unit K006.

If the VOC content of the "Window Frame" coating employed in K002 and/or K003 exceeds the allowable VOC limit of the 3.5 pounds per gallon, excluding water and exempt solvents, Airstream must immediately discontinue this operational practice and take immediate steps to assure that these violations are not repeated.

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**Proper record keeping of actual material used in emissions units K002, K003, and K006:**

Under the permit requirements for emissions units K002, K003 and K006, Airstream is required to collect and maintain records that appropriately reflect the materials that were actually employed in the individual emissions unit. These records are a very important part of the regulatory requirements for these emissions units. Failure to maintain appropriate records for these three emissions units constitute violations of OAC rule 3745-21-09(B), which outline the record keeping requirements and methods for emissions units regulated under OAC Chapter 3745-21-09.

Please be aware that this investigation may 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.

Please submit to this office, by Jan. 17, 2008, all of the above requested information.

If you have any questions or comments, please feel free to contact me at (937) 285-6032.

Sincerely,



Terry A. Sanner  
Environmental Specialist  
Southwest District Office

cc: Thomas A. Schneider, Ohio EPA, Supervisor DAPC /SWDO  
John Paulian, Ohio EPA DAPC /CO  
Lisa Holscher U.S. EPA, Region V

TAS/plh

