



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

July 17, 2007

Certified Mail

Robert Robbins

President

BK Plastics, Inc

PO Box 250

Covington, OH 45318-0250

WARNING LETTER

Dear Mr. Robbins:

BK Plastics, Inc., Ohio EPA premises no. 0855050532, located at 1400 Mote Dr, Covington, Ohio, is permitted to operate a 6- color flexographic printing press, K001. Emissions unit K001 was permitted under Permit to Install (PTI) 08-04571, modified on January 24, 2006. A Permit to Operate (PTO) for K001 was issued on March 20, 2006. On May 16, 2007, the Regional Air Pollution Control Agency (RAPCA) performed a compliance inspection of BK Plastics. During the inspection, RAPCA found the following violations of PTI 08-04571 and the PTO:

I. Exceedance of Daily VOC limit

Pursuant to A.1, emissions unit K001 is limited to 434 pounds per day (lbs/day) of VOC. During the May 16, 2007 inspection, RAPCA determined that in November 2006, BK Plastics exceeded the daily emissions limit on six days. The highest emissions recorded on those days was 470.64 pounds.

II. Exceedance of Daily Gallon Per Day Operational Restriction

Pursuant to B.2, emissions unit K001 is limited to 72 gallons per day (gals/day) of ink and thinner usage. During the May 16, 2007 inspection, RAPCA determined that in November 2006, BK Plastics exceeded the gallon per day ink and thinner usage restriction on eight days. The highest usage recorded on those days was 83 gallons.

III. Failure to Submit Quarterly Reports

Pursuant to D.1, BK Plastics is required to submit a quarterly deviation (excursion) report that identifies each day: the 434 lbs VOC/day limit was exceeded, the combined ink and thinner usage exceeded 72 gals/day, and the VOC content of the inks exceeded 6.02 lbs VOC/gal. RAPCA has not received any quarterly reports since January 2006.

IV. Late Submittal of the Synthetic Minor Fee Emission Report (SMFER)

Pursuant to the Ohio Revised Code (ORC) Section 3745.11, facilities that have obtained synthetic minor status to avoid Title V permitting must pay an annual fee based upon the reported annual actual emissions. The completed emissions reporting form is due by April 15, 2007. Ohio EPA received the SMFER submitted by BK Plastics on June 6, 2007.

Failure to comply with the terms and conditions of PTI 08-4571 and the PTO as cited above in sections I,

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II, and III is a violation of PTI 08-04571, the PTO, and Ohio Revised Code (ORC) 3704.05. Failure to submit the SMFER by April 15, 2007 is a violation of ORC 3745.11.

RAPCA is concerned with BK Plastics continuing failure to comply with emissions limitations and operational restrictions, maintain records, and submit the required reports. On March 12, 2005, RAPCA sent a letter to BK Plastics notifying the facility of delinquent reports and requesting that BK Plastics submit the reports by March 31, 2005. No response was submitted by BK Plastics. On June 27, 2005, RAPCA issued a Warning Letter to BK Plastics for exceeding the VOC content limit of the inks, failure to maintain records, failure to submit quarterly deviation reports and annual report, and failure to submit the SMFER for 2004. BK Plastics responded by submitting the delinquent quarterly reports, submitting the SMFER, and requesting a permit to install (PTI) modification. On May 1, 2006, RAPCA issued a Warning Letter to BK Plastics for failure to maintain records, submit an annual report, and submit the SMFER for 2005. BK Plastics responded to the Warning Letter by submitting the SMFER. Additionally, the 2006 Warning Letter requested that BK Plastics submit a written compliance plan and schedule to address the violations. No written plan was submitted by BK Plastics.

In order to address these violations, RAPCA requires that BK Plastics submit a written compliance plan and schedule to bring K001 into compliance with all applicable air pollution control regulations. At a minimum, this plan shall include a plan to bring K001 into compliance with all applicable emissions limitations and operational restrictions and all delinquent quarterly reports. These quarterly reports shall document all exceedances of the emissions limitations and operational restrictions in K001. This information shall be submitted within fourteen (14) days of receipt of this letter. Upon receipt and review of the compliance plan, RAPCA will be contacting BK Plastics to schedule a meeting to discuss the ongoing nature of the violations. Similar violations in the future or a lack of written response to this Warning Letter may result in enforcement action, including civil penalties, being pursued by RAPCA or Ohio EPA. The determination whether to pursue such penalties will be made by Ohio EPA and RAPCA at a later date.

Sincerely,



Eileen C. Moran

cc: Lisa Holscher, USEPA
Tom Kalman, OEPA
Jeff Canan, RAPCA

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1. Article Addressed to:

ROBERT ROBBINS
BK PLASTICS
PO BOX 250
COVINGTON, OH 45318-0250

2. Article Number

(Transfer from service label)

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PS Form 3811, February 2004

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Agent

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BK PLASTICS
PO BOX 250
COVINGTON, OH 45318-0250

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