



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

May 21, 2009

Certified Mail

Mr. David Bullard

Troy Laminating & Coating Incorporated

421 South Union Street

Troy, Ohio 45373

RE: Facility ID: 0855140077

WARNING LETTER

Dear Mr. Bullard:

On January 29 and February 11, 2009, a representative from the Regional Air Pollution Control Agency (RAPCA) performed a compliance evaluation at Troy Laminating and Coating Incorporated. As part of the evaluation, the inspector reviewed records as required by permit terms and conditions for emissions units K005 and K007. It was determined that Troy Laminating and Coating failed to comply, in part, with the Maximum Achievable Control Technology (MACT) Standards for Paper and Other Web Coating in 40 Code of Federal Regulations (CFR) Part 63 Subparts JJJJ, 40 CFR Part 64, Compliance Assurance Monitoring (CAM) and the TV operating permit issued on December 8, 2008.

Per 40 CFR 63.3350(f)(3) and emissions units terms and conditions 3)(d)(3) for K005 and 4)(d)(3) for K007 in the TV operating permit, Troy Laminating and Coating shall record the pressure differential across the enclosure as part of the daily inspections of the permanent total enclosure. Review of records indicates that operators are not consistently recording the pressure differential as stated in the plan. The failure to record the pressure differential is in violation of 40 CFR 63.3350(f)(3), the TV operating permit and Ohio Revised Code (ORC) 3704.05

Per 40 CFR 64.9(a) and emissions unit terms and conditions 3)(e)(4) for K005 and 4)(e)(4) for K007 of the TV operating permit, Troy Laminating and Coating shall submit semiannual reports for each deviation from emission limits or operating limits. The quarterly and semiannual reports submitted by Troy Laminating and Coating failed to include the deviations regarding the pressure differential across the enclosure.

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The failure to report deviations is in violation of 40 CFR 64.9, the TV operating permit and Ohio Revised Code (ORC) 3704.05

Troy Laminating and Coating shall review the records for emissions units K005 and K007 to document all days that the pressure differential across the enclosure was not recorded as well as deviations from operating limits and submit revised reports (quarterly, semiannual, TV compliance certification, etc.) within 30 days of receipt of this letter.

If you have any questions, please feel free to contact me at 937-496-7467.

Sincerely,

Michelle L. Flanagan
Air Pollution Control Specialist
Abatement Unit

cc: Mr. Jim Edwards, Environmental Consultant

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1. Article Addressed to: Mr. David Bullard Troy Laminating & Coating Inc. 421 South Union Street Troy, OH 45373	B. Received by (Printed Name) <i>A. Hinkle</i> C. Date of Delivery <i>5/22/09</i>
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:
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