



## 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

August 21, 2008

### Certified Mail

Katie Magoteaux, Manager

AOT, Inc.

4800 Gateway Blvd.

Springfield, OH 45502

(0812100480)

### WARNING LETTER

Dear Mrs. Magoteaux:

The purpose of this letter is to discuss the Regional Air Pollution Control Agency's (RAPCA) concerns at AOT, Inc. (AOT). The review of quarterly reports submitted by AOT and received by RAPCA since January 1, 2007, for air emissions unit K001, indicate that several coating content limitation exceedances have occurred for emission unit K001. Specifically, K001 exceeded the 3.5 lbs of volatile organic compound (VOC) per gallon of coating (excluding water and exempt solvents) limitation established in Permit to Install (PTI) 08-2213, issued August 14, 1991, and the Permit to Operate (PTO) issued November 29, 2005, and later modified on March 30, 2007.

The reported coating content limitation exceedances are violations of the restrictions listed in the PTI, PTO, Ohio Administrative Code (OAC) rule 3745-21-09(U)(1)(c), and Clark County Combined Health District Air Pollution Control Regulations (CCCHDAPCR) 3745-21-09(U)(1)(c).

RAPCA's response to the letter received from AOT on August 6, 2008, is that AOT is subject to OAC rule 3745-21-09(U)(1)(c), 3.5 lb VOC/gal of coating limit and must comply with this by calculating usage on a daily weighted average. AOT's letter requested a modification to allow a higher VOC content limit. However, the permits are rule based and a limit higher than 3.5 lb VOC/gal cannot be given, unless K001 is controlled as defined in OAC rule 3745-21-09(U)(1)(c). Additional restrictions placed on the quantity of coating applied would have no effect, as the rule is based on the VOC content of the coatings and not on the quantity applied.

Based on AOT's process, the source is subject to OAC rule 3745-21-09(U)(1)(c). AOT does not qualify for the exemption listed in OAC rule 3745-21-09(U)(2)(d), as the exemption was intended for a coating operation which coats motor vehicles and not components for motor vehicles. AOT has three options available; comply with the required 3.5 lbs VOC/gal of coating (excluding water and exempt solvents), add air pollution control to K001, or submit to Ohio EPA, a revision to the State Implementation Plan (SIP). If AOT chooses to submit a revision to

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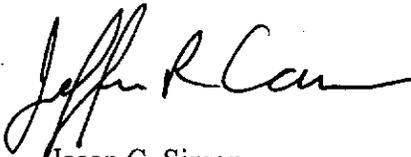
the SIP, AOT would need to support why they are unable to comply with the daily weighted average as stated in OAC rule 3745-21-09(U)(1)(c) and state any alternative compliance methods that could be used. The request for a SIP revision must include a Best Available Technology (BAT) study.

Although your potential to emit calculation supports your claim of being a non-TV facility, because AOT has not been in compliance with OAC rule 3745-21-09(U)(1)(c) since 2007, RAPCA cannot address AOT's request to be removed from synthetic minor status until AOT is in compliance with OAC rule 3745-21-09(U)(1)(c).

AOT is hereby notified of several violations of the 3.5 lbs VOC/gal of coating content limitation (excluding water and exempt solvents) as listed in PTI 08-2213. RAPCA requests a compliance plan be submitted demonstrating how AOT will bring air emissions unit K001 into compliance with OAC 3745-21-09(U)(1)(c) or a notification of the intent to submit a SIP revision, including the timeline. AOT shall submit this plan to RAPCA within 30 days of receipt of this letter.

RAPCA appreciates your prompt attention and cooperation in the above matter. Please feel free to contact me or Carlos Lynch at 225-4435 if you have any additional questions.

Sincerely,



For Jason C. Simon  
Air Pollution Control Specialist  
Abatement Unit

cc Tom Kalman, Ohio EPA  
Lisa Holscher, U.S. EPA  
Jefferis Canan, RAPCA

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1. Article Addressed to:

KATIE MAGOTEAUX  
**AOT INC**  
 4800 GATEWAY BLVD  
 SPRINGFIELD, OH 45502

2. Article Number  
(transfer from service label)

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PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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 X *Heather Wallen*  Agent  Addressee

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KATIE MAGOTEAUX  
**AOT INC**  
 4800 GATEWAY BLVD  
 SPRINGFIELD, OH 45502

PS Form 3800, August 2006

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