



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

October 28, 2008

Certified Mail

Dick Woeber

Woeber Mustard Mfg. Co.

1966 Commerce Circle

Springfield, OH 45501

RE: OEPA Facility ID 0812100600

**Failure to Develop and Implement a Facility Leak Detection and Repair (LDAR)
Program and Conduct Proper Emission Testing on Emission Unit P801**

Dear Mr. Woeber:

WARNING LETTER

On July 31, 2008, the Regional Air Pollution Control Agency (RAPCA) witnessed a performance test and performed a full compliance evaluation (FCE) of Woeber Mustard Manufacturing Company, located at 1966 Commerce Circle in Springfield, Ohio. As a result of the FCE, RAPCA discovered that Woeber failed to develop and implement a facility Leak Detection and Repair (LDAR) program as required by Ohio Administrative Code (OAC) rule 3745-21-09(DD) (Leaks from Process Units that Produce Organic Chemicals), 40 CFR 60 VVa (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction or Modification Commenced after November 7, 2006) and Permit to Install (PTI) 08-04838, issued April 12, 2007, for emissions unit (EU) P801 (Fugitive Emissions from Equipment Leaks).

Specifically, Part II.A.2.b of PTI 08-04838 for EU P801 states that the permittee shall include the appropriate process equipment and regulated components in a facility LDAR program. The LDAR program shall comply with the appropriate provisions (including operational restrictions, monitoring and recordkeeping, reporting and testing) of OAC rule 3745-21-09(DD) and 40 CFR 60 VVa. In the case of overlapping provisions, the permittee shall comply with the more stringent requirement. Additionally, Part II.A.2.c of PTI 08-04838 for EU P801 states the permittee shall develop and implement a facility LDAR program within 180 days of startup of EU P801.

Part II.E.2 of PTI 08-04838 for EU P801 states that the permittee shall conduct emission testing within 60 days after achieving the maximum production rate at which EU P801 will be operated, but not later than 180 days after initial startup of EU P801. The emission testing shall be

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conducted to demonstrate compliance with OAC rule 3745-21-09(DD) and 40 CFR 60.485, using reference methods and procedures specified in 40 CFR 60.485(a) while EU P801 is operating at or near its maximum capacity. Failure to develop and implement a facility LDAR program and conduct emissions testing within 180 days of startup of EU P801 are violations of OAC rule 3745-21-09(DD), 40 CFR 60 VVa and PTI 08-04838 for EU P801.

In order to resolve the above mentioned violations, RAPCA requires that Woeber submit a compliance plan within thirty (30) days after receipt of this letter. This plan shall include, at a minimum, an ITT for the required emission testing of EU P801 and measures to be taken by Woeber to develop and implement a facility LDAR program as required by OAC rule 3745-21-09(DD), 40 CFR 60 VVa and PTI 08-04838.

In addition, Woeber has failed to submit Permit to Install and Operate (PTIO) applications for EU's P001, P002 and P801. These applications should be submitted within 30 days after receipt of this letter.

Your cooperation in resolving these issues is greatly appreciated. If you have any questions regarding this letter, feel free to contact me at (937) 225-4453.

Sincerely,



Lesley A. Jenkins
Air Pollution Control Specialist

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|-----|---------------|-------|
| Cc: | Jeff Canan | RAPCA |
| | Lisa Holscher | USEPA |
| | Tom Kalman | OEPA |

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DICK WOEBER
WOEBER MUSTARD MFG CO.
 1966 COMMERCE CIRCLE
 SPRINGFIELD, OH 45501

2. Article Number
 (Transfer from service label)

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DICK WOEBER
WOEBER MUSTARD MFG CO.
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 SPRINGFIELD, OH 45501

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