



REGIONAL AIR POLLUTION CONTROL AGENCY

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

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July 5, 2007

Certified Mail

Mr. Tim Collette
Honeywell CPG, Fram Operations
851 Jackson Street
Greenville, Ohio 45331

Re: Ohio EPA Facility ID: 0819070018

WARNING LETTER

Dear Mr. Collette:

On May 16, 2007, an inspector from the Regional Air Pollution Control Agency (RAPCA) conducted a compliance evaluation at Honeywell Consumer Products Group (Honeywell). As part of the evaluation, the inspector determined that the regenerative thermal oxidizer (RTO) circular chart recorder for emissions unit P047, P048, P049 and P050 indicated temperatures deviated from permit limits. Further record review for emissions unit N003 also indicated non-compliance with permit limits regarding afterburner temperatures. Also, all quarterly reports submitted by Honeywell during the non-compliant period stated "no deviations" occurred from permit terms and conditions. In addition, the 2006 annual report submitted for emissions units P014, P031 and P041 failed to contain the sealant usage as required by permit terms and conditions.

Emissions Units P047, P048, P049 and P050, Paper Curing Ovens

Per Part III, Special Terms and Conditions, Section B.1., of Permit to Install (PTI) 08-04315 issued 02/19/2002 and the Permits to Operate (PTO) issued 09/15/2005, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit. As part of the compliance evaluation, the RAPCA representative reviewed the RTO circular chart records for the time period beginning in May 2006, and ending April 5, 2007. All records showed time periods when temperatures were below the 1650 degrees Fahrenheit temperature limit.

Honeywell's plant engineer explained that the RTO is programmed to operate at the required temperature limitation and that the chart recorder is not aligned to record the actual temperature signal to the proper line on the chart paper. This temperature recorder must be calibrated to

Mr. Collette
July 5, 2007
Page 3

RAPCA appreciates your cooperation in the above matters. If you have any further questions, please feel free to contact me at 496-7467.

Sincerely,

A handwritten signature in black ink that reads "Michelle L. Flanagan". The signature is written in a cursive style with a large, looped "M" and "F".

Michelle L. Flanagan
Air Pollution Control Specialist
Abatement Unit