



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

September 29, 2009

Certified Mail

Mr. Harry Heitkamp

Owner

Dynamic Weld Corporation

242 North Street

PO Box 127

Osgood, OH 45351

**Re: Ohio EPA Premises No. 0819820239
Deviations of the Maximum Daily Coating Usage Limit**

WARNING LETTER

Dear Mr. Heitkamp:

On August 4, 2009, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection of the Dynamic Weld Corporation (DWC) facility located at 242 North Street, Osgood, Darke County, Ohio. The purpose of the inspection was to provide compliance assistance to the facility, as well as determine if DWC is subject to **40 CFR 63 Subpart HHHHHH [National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]**, also known as "6H."

After review of the Material Safety Data Sheets (MSDS's) provided by DWC, RAPCA has determined that DWC does not currently employ coatings that contain the Hazardous Air Pollutants (HAP's) regulated under 6H (**cadmium, chromium, manganese, lead and nickel**) in emissions unit (EU) K001 (Paint Booth with Electrostatic Gun), and is therefore not subject to this rule. However, RAPCA also discovered that DWC has repeatedly exceeded the maximum daily coating usage limit in Permit to Install (PTI) 08-04176, issued July 11, 2000, and the Permit to Operate (PTO), issued January 13, 2000, for EU K001.

Pursuant to Ohio Administrative Code (OAC) rule 3745-21-09(U)(2)(e)(iii), PTI 08-04176 and the PTO for EU K001, DWC is limited to 10 gallons of coating per day (gal/day) or less. Based on paint usage records reviewed by RAPCA during the inspection, RAPCA has determined that

DWC exceeded the maximum daily coating usage limit of 10 gal/day on multiple days in July of 2009. Exceeding the maximum daily coating usage limit is a violation of OAC rule 3745-21-09, PTI 08-04176, the PTO for EU K001 and Ohio Revised Code (ORC) 3704.05.

Additionally, Part II.C (Monitoring and/or Record Keeping Requirements) of PTI 08-04176 and the PTO for EU K001 requires that DWC collect and record the following information:

1. **Each day** for the coating line:
 - a. The name and identification number of each coating employed, including thinners and/or other additives.
 - b. The VOC (volatile organic compound) content of each coating, as applied, in pounds per gallon (lbs/gal).
 - c. The volume, in gallons, of each coating employed.
 - d. The total volume, in gallons, of all of the coating employed.
2. **Each month** for the purpose of determining annual VOC emissions:
 - a. The name and indentification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in lbs/gal.
 - d. The VOC content of each coating, as applied, in lbs/gal.
 - e. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

Records reviewed by RAPCA during the inspection indicate that DWC has not consistently kept coating usage records as required and does not currently track thinner or cleanup usage at all. I have enclosed with this letter an example daily paint usage log that may be used to collect and record the required information. Failure to maintain records in accordance with permit terms and conditions is a violation of PTI 08-04176, the PTO for EU K001 and ORC 3704.05.

Furthermore, Part II.D.1 (Reporting Requirements) of PTI 08-04176 and the PTO for EU K001 requires that DWC notify RAPCA in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit of 10 gallons within 45 days after the exceedance occurs. Failure to report exceedances of the maximum daily coating usage in the required timeframe is a violation of PTI 08-04176, the PTO for EU K001 and ORC 3704.05.

Finally, the PTO for EU K001 states that a complete renewal application should be submitted no earlier than 18 months and no later than 180 days prior to the expiration date. The PTO for EU K001 will expire on January 13, 2010. Therefore, a Permit to Install and Operate (PTIO) renewal application should have been submitted no later than July 17, 2009.

In order to resolve the above mentioned violations, RAPCA requires that DWC submit any daily record showing that the coating line exceeded the maximum daily coating usage limit for the years 2008 and 2009, a compliance plan and schedule for EU K001, as well as a PTIO renewal application, within 30 days of receipt of this letter. This compliance plan may include applying

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for a new PTIO with alternate methods of complying with OAC rule 3745-21-09.

Your dedication to resolving this issue is greatly appreciated. If you have any questions regarding this matter, feel free to contact Jennifer Riley at (937)225-4438 or me at (937)225-4453.

Sincerely,



Lesley A. Jenkins

Air Pollution Control Specialist

CC: Jefferis Canan, RAPCA
Lisa Holscher, USEPA
Tom Kalman, OEPA

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<p>1. Article Addressed to:</p> <p>MR HARRY HEITKAMP DYNAMIC WELD CORP 242 NORTH ST PO BOX 127 DAYTON, OH 45351</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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MR HARRY HEITKAMP
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