



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties  
117 South Main Street, Dayton, Ohio 45422-3280  
937-255-4435 — Fax: 937-225-3486  
www.rapca.org

March 29, 2011

### Certified Mail

Gary Vanover  
Stillwater Coating Company  
868 Sater Street  
Greenville, OH 45331

**RE: OEPA Facility ID: 0819070244**  
**Full Compliance Evaluation (FCE) December 9, 2010**

Dear Mr. Vanover,

### WARNING LETTER

On December 9, 2010, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection, as part of a Full Compliance Evaluation (FCE), of the Stillwater Coating Company (SCC) facility located at 868 Sater Street in Greenville, Darke County, Ohio. The purpose of this letter is to address and seek resolution to issues discovered during the course of the FCE and file review pertaining to emissions units (EUs) K001 (Spray Coating Booth No. 1 with dry filtration system) and K002 (Spray Coating Booth No. 2 with filtration system).

Pursuant to the **Monitoring and Recordkeeping Requirements** stated in Permit-to-Install and Operate (PTIO) P0104655, issued June 25, 2009, SCC is required to maintain various records pertaining to the use of EUs K001 and K002 as follows:

1. For **each day**, SCC is required to collect and record:
  - a. The name and identification number of each coating employed
  - b. The total number of gallons of all the coatings employed
  
2. For **each month**, SCC is required to collect and record:
  - a. The name and identification of each coating and cleanup material employed
  - b. The number of gallons of each coating and cleanup material employed
  - c. The volatile organic compound (VOC) content of each coating and cleanup material, as applied, in pounds per gallon
  - d. The total monthly VOC emissions from all coatings, in pounds
  - e. The number of gallons **and** amount, in pounds, of cleanup materials recovered for recycling or treatment
  - f. The total monthly VOC emissions from all cleanup materials, in pounds (minus the amount of cleanup recovered, in pounds)
  - g. The total monthly VOC emissions from coatings and cleanup materials, combined
  - h. The rolling, 12-month summation of VOC emissions from coatings and cleanup materials, combined

3. For **each month**, SCC is also required to collect and record the following information for **all coatings and cleanup materials containing hazardous air pollutants (HAPs)**:
  - a. The name and identification number or code of any and each material (coating, thinner, additive, cleanup or other) containing any HAP
  - b. The name/identification and weight fraction of each individual HAP contained in each material applied
  - c. The number of gallons of each HAP-containing material employed
  - d. The density of each HAP-containing material, in pounds per gallon
  - e. For each individual HAP, the total emissions from all materials employed, in tons
  - f. The total combined HAPs emissions from all materials employed
  - g. The rolling, 12-month summation of emissions for each individual HAP, in tons
  - h. The rolling, 12-month summation of emissions for all HAPs combined, in tons

While on site December 9, 2010, RAPCA noted that SCC is not adequately maintaining daily and monthly records for EUs K001 and K002, as required. **Failure to maintain daily and monthly records as required by permit terms and conditions is a violation of PTIO P0104655 and ORC 3704.05. RAPCA requires that SCC submit a compliance plan including, at a minimum, measures to be taken by SCC to ensure that daily and monthly records are maintained for EUs K001 and K002, as required by permit terms and conditions, within 30 days of receipt of this letter.**

Additionally, the **Reporting Requirements** stated in PTIO P0104655, for EUs K001 and K002, require SCC to:

1. Submit **quarterly deviation reports\*** that identify:
  - a. Any deviations of the rolling, 12-month limit of 3,000 gallons of coating and cleanup usage
  - b. Any deviations of the rolling, 12-month emissions limitation for each individual HAP or total combined HAPs
  - c. Any record indicating that the dry particulate filter system was not in service or not operated according to the manufacturer's recommendations when the EU was in operation
  - d. The probable cause of each deviation
  - e. Any corrective actions taken to remedy the deviations or to prevent future deviations
  - f. The magnitude and duration of each deviation

**\*If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a quarterly report including a statement to this effect.**

2. Submit **quarterly reports** documenting any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute," and **if no changes were made to the emissions, EU(s) or the exhaust stack, then a quarterly report stating such must be submitted.**
3. Submit **annual reports** that specify the actual coating and cleanup material usages and the total VOC and HAPs emissions for each calendar year for each EU. This reporting requirement may be satisfied by including the above information for each EU separately in the annual **Fee Emissions Report (FER), due April 15** of each year.
4. Submit an **Annual Permit Evaluation Report (PER)** by the due date (**February 15** of each year) identified in the Authorization section of the PTIO.

**To date, SCC has not submitted any quarterly deviation reports or the 2009 and 2010 annual report/FER as required by PTIO P0104655.** Quarterly reports must be submitted by: **April 30** for 1<sup>st</sup> quarter (January 1 through March 31), **July 31** for 2<sup>nd</sup> quarter (April 1 through June 30), **October 31** for 3<sup>rd</sup> quarter (July 1 through September 30), and **January 31** of the following year for 4<sup>th</sup> quarter (October 1 through December 31) of each year.

**Failure to submit the required quarterly deviation and annual/FER reports is a violation of PTIO P0093066 and ORC 3704.05. At this time, RAPCA requires that SCC submit the required quarterly compliance reports for the 3<sup>rd</sup> and 4<sup>th</sup> quarters of 2009, all four quarters of 2010, as well as the 2009 annual report/FER. In addition, please note that the 2010 annual report/FER is due by April 15, 2011.** These reports are required to be submitted electronically via the Air Services division of OEPA's online eBusiness Center within 30 days of receipt of this letter.

Finally, on March 24, 2010, RAPCA received a hard copy of SCC's 2009 Annual Permit Evaluation Report (PER). In that report, SCC stated that there were no deviations of monitoring, record keeping or reporting requirements for EUs K001 and K002. This is an inaccurate statement based on the fact that SCC failed to meet any quarterly and annual reporting requirements for 2009. Additionally, SCC has not yet submitted the 2010 PER due February 15, 2011. **RAPCA requires that SCC submit a revised 2009 PER indicating the deviations of quarterly and annual reporting requirements described above, as well as the past due 2010 PER electronically via Air Services within 30 days of receipt of this letter.**

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Your prompt attention to this matter is greatly appreciated. Please respond with the requested information within 30 business days following receipt of this letter. Any further violations of the regulations will result in enforcement actions against you which could include criminal and/or civil penalties. Thank you for your time and cooperation. If you have any questions regarding this matter feel free to contact me at (937)225-4453.

Sincerely,

A handwritten signature in cursive script that reads "Lesley A. Jenkins". The signature is written in black ink and is positioned above the printed name.

Lesley A. Jenkins

Air Pollution Control Specialist

cc: Jeff Canan, RAPCA  
Tom Kalman, OEPA  
William MacDowell, USEPA Region V

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Gary Vanover  
 Still Water Coating Company  
 868 Sater Street  
 Greenville, Ohio 45331

2. Article Number  
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PS Form 3811, February 2004

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- Agent  
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GARY VANOVER

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Sent to Still Water Coating Company  
 Street, Apt or PO Box 868 Sater Street  
 City, State Greenville, Ohio 45331

PS Form 3800, August 2006 See Reverse for Instructions

