



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 17, 2009

Certified Mail

Cheryl White

Neaton Auto Products Mfg., Inc.

975 South Franklin St.

Eaton, OH 45320

RE: Ohio EPA Facility ID 08-68-03-0155
Exceedances of the Daily OC Emissions Limitation for Emissions Units P041 through P044

Dear Ms. White:

WARNING LETTER

The Regional Air Pollution Control Agency (RAPCA) has recently reviewed the 2nd Quarter 2009 Title V Compliance Report, submitted by Neaton Auto Products Mfg., Inc. (Neaton) through Air Services, dated July 30, 2009. In this submittal, Neaton acknowledged exceedances of the daily organic compound (OC) emissions limitation of 40 pounds per day (lbs/day), on June 22, 2009 and June 25, 2009, for emissions units (EU) P041 (Reaction Injection Molding Booth #19), P042 (Reaction Injection Molding Booth #20), P043 (Reaction Injection Molding Booth #21), and P044 (Reaction Injection Molding Booth #22).

Specifically, Part III.A.1.1. of the Final Title V Operating Permit, issued April 4, 2007 for EUs P041-P044, as well as Permit to Install (PTI) 08-03782, issued January 14, 1998, state that the OC emissions from each of these units shall not exceed 40 lbs/day. On June 22, 2009, the actual OC emissions were reportedly 48.89 lbs/day for EU P041, 48.89 lbs/day for EU P042, 49.76 lbs/day for EU P043, and 49.76 lbs/day for EU P044. On June 25, 2009, Neaton reported 46.50 lbs/day OC emissions for EU P041, 45.32 lbs/day OC emissions for EU P043, and 45.32 lbs/day OC emissions for EU P044.

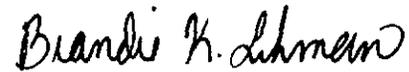
The exceedances of the 40 lbs/day OC emissions limitation are in violation of the Final Title V Operating Permit issued April 4, 2007, PTI 08-03782 issued January 14, 1998, Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), OAC rule 3745-21-07(G)(2) (the requirements established under OAC rule 3745-21-07 shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current rule as a revision to the Ohio SIP for the control of organic compounds), and Ohio Revised Code (ORC) 3704.05.

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RAPCA acknowledges that Neaton did submit a compliance plan with the 2nd Quarter 2009 Title V Compliance Report, which includes the primary cause of the deviations and the corrective actions that have and/or will be taken to ensure future compliance. RAPCA appreciates the timely manner in which Neaton is working to resolve this matter.

If you have any questions concerning this matter, feel free to contact me at 937-225-5923.

Sincerely,



Brandie K. Lehman
Air Pollution Control Specialist

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

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Cheryl White
Neaton Auto Products Mfg., Inc.
975 South Franklin Street
Eaton, OH 45320

2. Article Number
 (Transfer from service label)

7008 1830 0003 0181 3928

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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X *Kim R. Willetts*

- Agent
 Addressee

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Kim Willetts

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8-18-09

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 Neaton Auto Products Mfg., Inc.
 975 South Franklin Street
 Eaton, OH 45320

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PS Form 3800, August 2006

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