



REGIONAL AIR POLLUTION CONTROL AGENCY

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

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www.rapca.org

June 17, 2011

Certified Mail

Paul Hemker, Owner
Dynamic Plastics, Inc.
8207 State Route 121
New Paris, OH 45347

WARNING LETTER

Dear Mr. Hemker:

The purpose of this letter is to discuss the Regional Air Pollution Control Agency's (RAPCA) concerns regarding Dynamic Plastics Inc., OEPA facility ID# 0868070055. Review of daily usage records for air emission unit K002, fiberglass spray booth, indicate that the styrene limitation for unit K002 has exceeded the limitations established in Dynamic Plastics' Permit to Operate (PTO) issued 09/15/05. Furthermore, various reports and record keeping requirements have not been completed or submitted as required by the current PTO.

PTOs were issued on September 15, 2005, for air emissions unit K001, K002, and K003. Usage limits and organic compound (OC) content limits were established in these permits to reflect the information you supplied to RAPCA at that time.

Upon review of records during the 2011 facility inspection, it was noted that the styrene content of the resin used in air emissions unit K002 has exceeded the Operational Restriction (2. The styrene in the resins applied in this emissions unit shall not exceed 31% by weight) established in the PTO. Specifically, the resin used in K002 is 45% styrene by weight, exceeding the permit limit of 31% styrene by weight. RAPCA is aware that Dynamic Plastics has worked with its supplier and has not been able to identify a suitable resin that meets the percentage listed in the current permit. RAPCA is in receipt of a permit application [Federally Enforceable Permit to Install and Operate (FEPTIO) number P0094099] submitted by Dynamic Plastics on April 16, 2011, to modify the percent styrene by weight limit in the resin.

During the inspection it was also noted that Dynamic Plastics has failed to record the 12-month rolling usage of resin for K001, K002 and K003 as required by PTO Part II Section C.1.(f), and has failed to properly report quarterly deviations as specified in the corresponding PTOs. Per PTO Part II Sections D.1.a. through D.1.c., air emissions unit K001, K002, and K003 are required to submit quarterly deviation reports that include the following information:

K001 Reporting Requirements

- a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 16.16 pounds per day, and the actual average daily organic compound emission for each such day.
- b. Each month that the 12 month rolling summation of resin usage exceeds 28.93 tons.
- c. Any resins applied in this emissions unit with a styrene concentration that exceeds 36% by weight when performing gel coat operations, or 45% by weight when performing spray up operations.

K002 Reporting Requirements

- a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 15.44 pounds per day, and the actual average daily organic compound emission for each such day.
- b. Each month that the 12 month rolling summation of resin usage exceeds 30.88 tons.
- c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

K003 Reporting Requirements

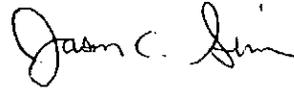
- a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 10.31 pounds per day, and the actual average daily organic compound emission for each such day.
- b. Each month that the 12 month rolling summation of resin usage exceeds 21.13 tons.
- c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

These reports must be submitted each quarter and include the information specified above along with any deviations from emission limits, operational restrictions and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in the permit, and the probable cause of such deviations, and any corrective actions or preventative measures which have been or will be taken. In the event that no deviations have occurred, a statement to this effect shall be submitted each quarter. Each of these quarterly reports must be submitted by January 31, April 30, July 31, and October 31 of each year. **To date, proper quarterly reports have not been submitted.** Specifically, reports detailing deviations described above should have been submitted each quarter. A 2010 compliance report was submitted by Dynamic Plastics via Air Services on March 23, 2011. This 2010 compliance report was rejected based on the statement that there had been "no excursions" during 2010. RAPCA has documented and listed specific deviations/excursions in this letter that will need addressed in corrected quarterly reports.

Dynamic Plastics is hereby notified of deviations of styrene content restrictions for emission unit K002, and reporting and record keeping requirements in PTOs issued on 9/15/05 for emission units K001, K002 and K003. Dynamic Plastics shall devise a compliance plan to bring air emission units K001, K002, and K003 into compliance with all air pollution regulations. Dynamic Plastics shall submit quarterly deviation reports covering 2010 and first quarter of 2011, in which all known deviations are properly reported as required. **Dynamic Plastics shall submit this plan (including deviation reports) in writing to RAPCA by July 1, 2011.**

RAPCA appreciates your prompt attention and cooperation in the above matters. Please feel free to contact me at (937) 496-6751 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason C. Simon". The signature is fluid and cursive, with a large initial "J" and a distinct "S" at the end.

Jason C. Simon
Air Pollution Control Specialist
Abatement Unit

Cc: Jefferis Canan, Enforcement Supervisor, RAPCA

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1. Article Addressed to:

Paul Hemker, Owner
 Dynamic Plastics, Inc.
 8207 State Route 121
 New Paris, OH 45347

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PS Form 3811, February 2004

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To Paul Hemker, Owner
 Dynamic Plastics, Inc.
 8207 State Route 121
 New Paris, OH 45347

PS Form 3800, August 2006

See Reverse for Instructions