



## 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

July 13, 2007

### Certified Mail

Mike LaPrade

Vice President

Industrial Fiberglass Specialties, Inc.

521 Kiser St.

Dayton, Ohio 45404

### WARNING LETTER

Dear Mr. LaPrade:

On June 13, 2007, the Regional Air Pollution Control Agency (RAPCA) received a complaint regarding chemical odors being emitted from Industrial Fiberglass Specialties, Inc (IFS). On that day, RAPCA performed surveillance in the areas surrounding the IFS facilities located at 521 Kiser St. and 351 Deeds Ave. and observed styrene odors at both locations. Based on the styrene odors, RAPCA determined that IFS was operating potential air contaminant sources and delivered a Permit to Install (PTI) application. On June 18, 2007, the Regional Air Pollution Control Agency (RAPCA) conducted scheduled inspections of the IFS facilities located at 521 Kiser St. and 351 Deeds Ave. During the inspections, RAPCA determined that IFS is operating unpermitted air contaminant sources that are used in the manufacturing of fiberglass reinforced plastics at both of these facilities.

Pursuant to Ohio Administrative Code (OAC) rule and the Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) 3745-31-02(A)(1), "no person shall cause, permit, or allow the installation of a new source of air pollutants...without first obtaining a permit-to-install." An air contaminant source is an operation or activity that results or may result in the emission of particulate matter, dust, fumes, gas, mist, radionuclides, smoke, vapor or odorous substances, or any combination thereof. Based on the June 18, 2007 inspections, RAPCA has determined that IFS installed and began operating air contaminant sources prior to obtaining a PTI. This is a violation of OAC rule 3745-31-02(A)(1), MCCGHDAPCR rule 3745-31-02(A)(1), and Ohio Revised Code (ORC) 3704.05.

The manufacturing of fiberglass reinforced plastics is subject to OAC rule and MCCGHDAPCR rule 3745-21-07(G)(2) which requires that individual sources of photochemically reactive materials (PRM) emit no more than 8 pounds per hour and 40 pounds per day of organic compounds (OC). The manufacturing of fiberglass reinforced plastics at a major source of

Michael LaPrade  
July 13, 2007  
Page 2

Hazardous Air Pollutants (HAPs) is also subject to 40 CFR Part 63, Subpart WWWW, the Reinforced Plastics Composite Production NESHAP. A major source of HAPs is a facility that emits or has the potential to emit (PTE) of 10 tons per year or more of a single HAP or 25 tons per year or more of any combination of HAPs.

Pursuant to OAC rule and MCCGHDAPCR rule 3745-77-02, major sources of HAPs are subject to the Title V permit program and are required to submit a complete Title V permit application within twelve months of becoming subject to the Title V permit program. Based on Ohio EPA Engineering Guide #58, the two facilities located at 521 Kiser St. and 351 Deeds Ave. are considered a single facility for determining major source status and the applicability of the Title V permit program.

In order to address the violations listed above, IFS is required to submit a compliance plan within 30 days of receipt of this letter. This compliance plan shall include, at a minimum: (1) a PTI application, including an Emissions Category Activity (EAC) form and supporting calculations, (2) an OC and HAP PTE analysis for the previous three calendar years, (3) the actual OC and HAP emissions for the past three calendar years, (4) the actual OC and HAP emissions for January - June 2007, and (5) all supporting calculations, purchase records, and MSDS information. PTE is defined as the maximum capacity of an emissions unit or stationary source to emit an air pollutant under its physical and operational design. If the PTE analysis indicates that IFS is a major source, your compliance plan shall also include a determination of when IFS became a major source and a plan to comply with the Title V permit program requirements and 40 CFR Part 63, Subpart WWWW.

If you have any questions concerning the requested information or the regulations, please contact me at 937-225-4004.

Sincerely,



Eileen C. Moran  
Air Pollution Control Specialist

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>X Alexandria Matheson</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>Alexandria Matheson</i></p> <p>C. Date of Delivery <i>7/8</i></p>
<p>1. Article Addressed to:</p> <p>Mike LaPrade Vice President Industrial Fiberglass Specialties, Inc. 521 Kiser Street Dayton, OH 45404</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7004 1160 0000 6165 3583</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage \$		Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total		

Sent To: Mike LaPrade  
Vice President  
Industrial Fiberglass Specialties, Inc.  
521 Kiser Street  
Dayton, OH 45404

PS Form 3800, June 2002 See Reverse for Instructions

7004 1160 0000 6165 3583

100