



REGIONAL AIR POLLUTION CONTROL AGENCY

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

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February 11, 2008

Certified Mail

Mr. Ron Burns
Pro Line South
8641 Washington Church Rd.
Miamisburg, OH 45342

**RE: Ohio EPA Premises No. 0857093297
Exceedances of Daily Volume-Weighted Average VOC Content Limits for
Emissions Units K001 & K002**

Dear Mr. Burns:

WARNING LETTER

On October 30, 2007, a facility inspection was performed by the Regional Air Pollution Control Agency (RAPCA) at Pro Line South, located at 8641 Washington Church Road in Miamisburg, Ohio. During this inspection, RAPCA identified record keeping and reporting violations, for emissions units K001 (Paint Booth #1) and K002 (Paint Booth #2), which were addressed in a previous letter, dated November 28, 2007. This letter requested that Pro Line South submit revised records, providing all of the necessary values, and quarterly reports for the 2nd and 3rd quarters of 2007, within 30 days of receipt of that letter.

On January 7, 2008, RAPCA received the requested Quarterly Deviation Reports, for emissions units K001 and K002, for 2nd quarter 2007 through 4th quarter 2007. All of the reports submitted stated that there were no deviations to report for either emissions unit. On January 9, 2008, RAPCA received Monthly VOC Reports from Pro Line South for K001 and K002 which did identify some exceedances of the daily volume-weighted average VOC content limit. Upon further investigation and calculations completed by RAPCA, numerous exceedances have been identified for both K001 and K002.

Specifically, Part III.A.I.2.a of General Permit to Install (GPTI) 08-04823 issued January 23, 2007 and the General Permit to Operate (GPTO) issued May 22, 2007 for K001 state that the VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds (lbs) per gallon, as applied, excluding water and exempt solvents. From the records provided by Pro Line South on January 9, 2008, RAPCA has identified 168 days of operation, from April 2, 2007 through December 31, 2007, in which the daily volume-weighted average VOC content exceeded 3.5 lbs per gallon. These exceedances are violations of Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-21-09(U)(1), GPTI 08-04823, the GPTO issued May 22, 2007, and Ohio Revised Code (ORC) section 3704.05.

Part III.A.I.2.a of GPTI 08-04824 issued January 23, 2007 and the GPTO issued May 22, 2007 for K002 state that the VOC content of the coatings employed shall not exceed a daily volume-

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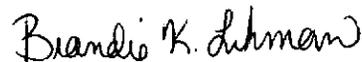
weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents. From the records provided by Pro Line South on January 9, 2008, RAPCA has identified 33 days of operation in which the daily volume-weighted average VOC content exceeded 3.5 lbs per gallon. These exceedances are violations of OAC rule and MCCGHDAPCR section 3745-21-09(U)(1), GPTI 08-04824, the GPTO issued May 22, 2007, and ORC 3704.05.

Part III.A.IV.1. of the GPTI and GPTO for emissions units K001 and K002 state that the permittee shall notify RAPCA in writing of each daily record showing a daily-volume-weighted average greater than 3.5 lbs VOC per gallon, as applied, excluding water and exempt solvents. This notification shall include a copy of such record and be sent within 30 days after the exceedance occurs. RAPCA did not receive notifications of any of the exceedances for K001 or K002 within 30 days after the exceedance occurred. Failure to notify RAPCA of the exceedances of the daily volume-weighted average VOC content for K001 and K002 is a violation of GPTI 08-04823 for K001, GPTI 08-04824 for K002, the GPTOs for K001 and K002, and ORC 3704.05.

RAPCA would like to point out that there are discrepancies between the permitted terms and conditions for emissions units K001 and K002 and the actual operating practices at Pro Line South. In order to resolve these discrepancies and the above mentioned violations, RAPCA is requesting that Pro Line South submit a compliance plan within 30 days after receipt of this letter. This plan shall include, at a minimum, measures to be taken by Pro Line South to return emissions units K001 and K002 to compliance with OAC rule and MCCGHDAPCR section 3745-21-09(U) and all permit terms and conditions. If needed, this plan will include submission of a Permit to Install (PTI) application to modify the terms and conditions of the permits for K001 and K002. This plan shall also include a facility wide plan to maintain required records and submit required reports in a timely manner.

RAPCA believes this to be a serious matter and future similar violations may result in an enforcement action with civil penalties. If you have any questions regarding this matter, feel free to contact me at (937) 225-5923.

Sincerely,



Brandie K. Lehman
Air Pollution Control Specialist

cc: Jeff Canan RAPCA
 Lisa Holscher USEPA
 Tom Kalman OEPA

