



## 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

May 27, 2008

**Certified Mail**

Keith Knight

Dayton Clutch & Joint, Inc.

2005 Troy Street

Dayton, OH 45404

**RE: Ohio EPA Facility ID #0857041930**

**Exceedance of coating VOC content limitation for emissions unit K002 and operating an unpermitted air emissions source**

Dear Mr. Knight:

**WARNING LETTER**

On February 19, 2008, the Regional Air Pollution Control Agency (RAPCA) performed an unannounced inspection of Dayton Clutch & Joint, Inc. (Dayton Clutch), located at 2005 Troy Street in Dayton, Ohio. As a result of this inspection, RAPCA has identified the following non-compliance issues.

Permit to Install (PTI) 08-2258, issued for emissions unit K002 (Dip Tank for Brake Shoes), on November 14, 1991, states that low VOC containing, water-based coatings are to be employed in this unit and these coatings must have a VOC content of less than or equal to 1.2 pounds per gallon (lbs/gal), less water. The Material Safety Data Sheet (MSDS), supplied by Dayton Clutch, for the two coatings employed in emissions unit K002, state that the VOC content of these coatings is 1.9 lbs/gal, less water and exempt solvents. The exceedance of the 1.2 lbs/gal VOC content limitation, less water, is a violation of PTI 08-2258 and Ohio Revised Code (ORC) 3704.05.

During the inspection conducted on February 19, 2008, RAPCA also identified an air emissions unit not included in RAPCA's permit file for this facility. Dayton Clutch operates an unpermitted batch oven (degreasing unit) for the purposes of refurbishing brake shoes. Operation of an air pollution source without first obtaining a PTI is a violation of Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-31-02 and Ohio Revised Code (ORC) 3704.05.

Specifically, OAC rule and MCCGHDAPCR section 3745-31-02 state that no person shall cause, permit, or allow the installation of a new source of air pollutants, or cause, permit, or allow the modification of an

Dayton Clutch & Joint, Inc.

May 27, 2008

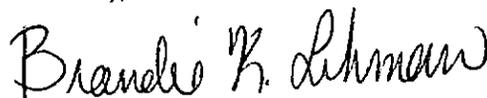
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air contaminant source, without first obtaining a permit to install. Dayton Clutch is hereby notified of the failure to obtain a PTI prior to the installation and operation of an air pollution source.

In order to resolve the above mentioned violations, RAPCA is requesting that Dayton Clutch submit a compliance plan within thirty (30) days after receipt of this letter. This plan shall include, at a minimum, measures to be taken by Dayton Clutch to return emissions unit K002 to compliance with all permit terms and conditions. If needed, this plan will include submission of a PTI application to modify the terms and conditions of the permit for emissions unit K002. In addition, RAPCA is requesting Dayton Clutch submit all 2007-2008 purchase records for the coatings used in emissions unit K002. These records will be used to determine compliance with monthly and annual VOC emissions limitations. Dayton Clutch must also submit a PTI application for the batch oven operated at this facility.

Enclosed with this letter are PTI applications and Emissions Activity Category (EAC) Forms to be used for emissions unit K002, if needed, and the batch oven. If you have any questions regarding this matter, feel free to contact me at (937) 225-5923.

Sincerely,

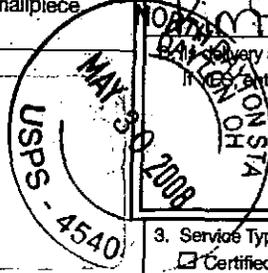


Brandie K. Lehman

Air Pollution Control Specialist

Cc:	Jeff Canan	RAPCA
	Lisa Holscher	USEPA
	Tom Kalman	OEPA

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 checked="" type="checkbox"/> <i>K. Jones</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Keith Jones</i> C. Date of Delivery <i>5-30-08</i></p>
<p>1. Article Addressed to:          Keith Knight          Dayton Clutch &amp; Joint, Inc.          2005 Troy Street          Dayton, OH 45404</p>	<p>Delivery address different from item 1? <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No. If Yes, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <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) <b>7007 1490 0004 7509 8777</b></p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	



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PS Form 3800, August 2005 See Reverse for Instructions												

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