



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

September 29, 2009

Certified Mail

Mr. Mike Stoll

AIDA-America Corporation

7660 Center Point 70 Boulevard

Huber Heights, OH 45424

**Re: Ohio EPA Premises No. 0857823121
Deviations of the Coating Volatile Organic Compound (VOC) Content Limit,
Monthly and Annual VOC Emissions Limits and Reporting and Record Keeping
Requirements for Emissions Unit (EU) K001 (Spray Paint Booth)**

WARNING LETTER

Dear Mr. Stoll:

On June 11, 2009, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection of the AIDA-America Corporation (AIDA) facility located at 7660 Center Point Boulevard in Huber Heights, Montgomery County, Ohio. The purpose of the inspection was to provide compliance assistance to the facility, as well as determine if AIDA is subject to **40 CFR 63 Subpart HHHHHH [National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]**, also known as "6H."

After review of the Material Safety Data Sheets (MSDS's) provided by AIDA, RAPCA has determined that AIDA does not currently employ coatings that contain the Hazardous Air Pollutants (HAP's) regulated under 6H (**cadmium, chromium, manganese, lead and nickel**) in emission unit (EU) K001 (Spray Paint Booth), and is therefore not subject to this rule. However, RAPCA also discovered that AIDA is currently employing coatings that contain volatile organic compounds (VOC) at a higher content than allowed per Permit to Install (PTI) 08-03726, issued September 10, 1997, for emissions unit (EU) K001 (Spray Paint Booth).

Pursuant to Ohio Administrative Code (OAC) rule 3745-21-09(U)(1)(c) and PTI 08-03726, AIDA is required to employ coatings that contain 3.5 pounds of VOC per gallon (lbsVOC/gal) of coating "as applied" or less in EU K001. Based on information in AIDA's 2009 daily paint

usage log provided to RAPCA during the inspection and the MSDS's emailed to RAPCA following the inspection, AIDA has continuously used two coatings in 2009 that have VOC contents higher than the allowable limit. Specifically, AIDA employed a PPG Industries, Inc. coating with the product name of "4F HS White Poly Comp A" between January 2 and May 8, 2009, which has a VOC content of 4.25 lbsVOC/gal. However, RAPCA is aware that the paint listed above may be combined with a PPG Industries, Inc. curing agent with the product name of "HS Urethane B Component," which has a VOC content of 0 lbsVOC/gal. Depending upon the ratio at which these two coatings are mixed, the VOC content "as applied" may not exceed the VOC content limit in PTI 08-03726. RAPCA requested this information over the phone and has yet to receive a response from AIDA. AIDA also employed a Kansai Paint Co., Ltd. coating with the product name of "FTALIT NO.1 531 WHITE" between May 11 and June 10, 2009, which has a VOC content of 4.32 lbsVOC/gal. Employing coatings that exceed the VOC content limit for EU K001 is a violation of OAC rule 3745-21-09(U)(1)(c) and PTI 08-03726.

Additionally, PTI 08-03726 provides monthly and annual VOC emissions limits for EU K001. Information from AIDA's paint log and MSDS's also indicates that AIDA is currently exceeding the monthly VOC emissions limit of 61 pounds of VOC per month (lbsVOC/month) and the annual VOC emissions limit of 0.36 tons per year (TPY) or 720 pounds of VOC per year (lbsVOC/year). Exceeding the monthly and annual VOC emissions limit for EU K001 is a violation of PTI 08-03726.

Furthermore, PTI 08-03726 requires AIDA to collect and record the following information each month for EU K001 for the purpose of determining monthly and annual VOC emissions:

- a) the name and identification number of each coating and cleanup material employed,
- b) the VOC content of each coating and cleanup material, as applied, in pounds per gallon,
- c) the volume, in gallons, of each coating and cleanup material employed, and
- d) the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons

Based on the information in AIDA's daily paint usage log, AIDA is only recording the volume, in quarts, of each coating employed in EU K001, excluding thinner and cleanup material. It is necessary for AIDA to track thinner and clean up material usage in order to determine all resulting VOC emissions. I have enclosed with this letter an example daily paint usage log that may be used to collect and record the required information. Failure to track thinner and clean up material usage is a violation of PTI 08-03726.

Finally, PTI 08-03726 requires that AIDA submit deviation reports that identify any month during which the 61 pound VOC emissions limit was exceeded or a noncompliant coating (>3.5lbsVOC/gal) was employed within 30 days following the end of the calendar month. To date, AIDA has not submitted any reports identifying deviations of permit terms and conditions. Failure to report exceedances of the monthly emissions limit or use of noncompliant coatings is a violation of PTI 08-03726.

AIDA-American Corporation
September 29, 2009
Page 3

In order to resolve the above mentioned violations, RAPCA requires that AIDA submit the daily paint usage logs for all of 2008 and 2009, as well as a compliance plan and schedule for EU K001, within thirty (30) days of receipt of this letter. This compliance plan may include AIDA switching to alternative coatings with lower VOC contents and/or applying for a new Permit-to-Install and Operate (PTIO) with alternate methods of complying with OAC rule 3745-21-09 and increased emissions limits. I have also enclosed a copy of PTI 08-03726 for your review.

Your dedication to resolving this issue is greatly appreciated. If you have any questions regarding this matter, feel free to contact me directly at (937)225-4453.

Sincerely,

Lesley A. Jenkins
Air Pollution Control Specialist

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X <i>Debbie Cooke</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <p>MR MIKE STOLL AIDA-AMERICAN CORPORATION 7660 CENTER POINT 70 BLVD HUBER HEIGHTS, OH 45424</p>	<p>B. Received by (Printed Name) <i>Debbie Cooke</i></p> <p>C. Date of Delivery 9-30-09</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>2. Article Number (Transfer from service label)</p>	<p>3. Service Type <input 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>PS Form 3811, February 2004</p>	<p>7009 0820 0000 7791 7498 Domestic Return Receipt 102695-02-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

OFFICIAL USE

Postage \$ _____

Certified Fee _____

Return Receipt Fee (Endorsement Required) _____

Restricted Delivery Fee (Endorsement Required) _____

Total Postage _____

Sent To: MR MIKE STOLL
AIDA-AMERICAN CORPORATION
7660 CENTER POINT 70 BLVD
HUBER HEIGHTS, OH 45424

Street, Apt. # or PO Box No. _____
City, State, Zi _____

PS Form 3800, August 2006 See Reverse for Instructions

7009 0820 0000 7791 7498