



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

December 17, 2009

Certified Mail

Mr. Seth Fordyce
Fordyce Finishing Co., Ltd.
7880 Germantown Pike
Germantown, OH 45327

**RE: Ohio EPA Facility ID 0857043341
Fordyce Finishing Co., Ltd. - 32 Bates Street, Dayton, OH 45402
Failure to submit an annual report and to keep required records for emissions units R001-R003**

Dear Mr. Fordyce:

WARNING LETTER

On October 28, 2009, the Regional Air Pollution Control Agency (RAPCA) performed an on-site inspection of Fordyce Finishing Co., Ltd. at 32 Bates Street in Dayton, Ohio 45402. As a result of this inspection, RAPCA has determined that emissions units (EUs) R001 (Coating Spray Line No. 1), R002 (Coating Spray Line No. 2), and R003 (Coating Booth No. 1) have not been operating in compliance with permit terms and conditions, due to the fact that the required recordkeeping is not being performed for these EUs and the 2008 annual report of total OC emissions from each of these EUs has not been submitted.

Specifically, Part C.1.d.1. of Permit to Install and Operate (PTIO) P0104844, issued May 11, 2009, for EUs R001 through R003 states that the permittee shall collect and record the following information each month:

- a. The name and identification of each coating and cleanup material employed.
- b. The volume, in gallons, of each coating and cleanup material employed.
- c. The OC content of each coating and cleanup material employed, in pounds per gallon.
- d. The total OC emissions rate for all the coating and cleanup materials, in tons.

In addition, Part C.1.d.5. of PTIO P0104844 requires that Fordyce Finishing Co., Ltd. document each inspection (periodic and annual) of the dry particulate filter system and maintain information including the date of the inspection, a description of each/any problem identified and the date it was corrected, a description of any maintenance and repairs performed, and the name of the person who performed the inspection. Part C.1.d.6. of PTIO P0104844 requires that Fordyce Finishing Co., Ltd. maintain records that document any time periods when the dry particulate filter was not in service when the EU(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available upon request.

Fordyce Finishing Co., Ltd.
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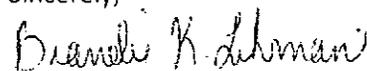
During the inspection performed at Fordyce Finishing Co., Ltd. on October 28, 2009, no required records were available for RAPCA's review. Failure to maintain records required by PTIO P0104844 is a violation of the PTIO and Ohio Revised Code (ORC) 3704.05.

Part II.D.2. of Permit to Install (PTI) 08-04891, issued January 24, 2008, for EUs R001 through R003, required that annual reports be submitted that specify the actual total OC emissions from each of these EUs for the previous calendar year. These reports were to be submitted to RAPCA by January 31 of each year. (On May 11, 2009, PTIO P0104844 was issued for EUs R001 through R003, which contains slightly different annual reporting requirements for the 2009 calendar year. Please refer to this PTIO for all future reporting). RAPCA issued a letter to Fordyce Finishing Co., Ltd. on August 13, 2009, requesting that the 2008 annual report be submitted within fourteen (14) days after receipt of that letter. To date, no 2008 annual report has been received by RAPCA. Failure to submit the 2008 annual report is a violation of PTI 08-04891 and ORC 3704.05.

In order to resolve the above mentioned violations, RAPCA is requesting that Fordyce Finishing Co., Ltd. submit a compliance plan and schedule within 14 days after receipt of this letter. This plan shall include, at a minimum, measures that have been or will be taken by Fordyce Finishing Co., Ltd. to ensure that all required records are being maintained, per PTIO P0104844. In addition, the 2008 annual report of the total OC emissions for EUs R001 through R003, shall also be submitted within 14 days. RAPCA did inform Fordyce Finishing Co., Ltd. during the October 28, 2009 inspection that purchase records from all suppliers for 2008 will be accepted.

Failure to return EUs R001 through R003 to compliance with all permit terms and conditions will subject this facility to further enforcement actions, which may include penalties. If you have any questions concerning 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

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1. Article Addressed to:

Mr. Seth Fordyce
Fordyce Finishing Co. LTD.
7880 Germantown Pike
Germantown, OH 45327

2. Article Number
(Transfer from service label)

7008 1830 0003 0181 0156

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X *Angela Fordyce*

- Agent
- Addressee

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Angela Fordyce

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PS Form 3811, February 2004

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Mr. Seth Fordyce
Fordyce Finishing Co. LTD.
7880 Germantown Pike
Germantown, OH 45327

PS Form 3800, August 2006

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