



REGIONAL AIR POLLUTION CONTROL AGENCY

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

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www.rapca.org

March 23, 2010

Certified Mail

Charles Middleton
The Walker Auto Group, Inc.
8457 Springboro Pike
Miamisburg, OH 45342

RE: Ohio EPA Facility ID 0857783017
Record keeping and reporting violations documented during January 13, 2010 inspection

Dear Mr. Middleton:

WARNING LETTER

On January 13, 2010, the Regional Air Pollution Control Agency (RAPCA) conducted an announced inspection of The Walker Auto Group, Inc., located at 8457 Springboro Pike in Miamisburg, Ohio. As a result of this inspection, RAPCA has determined that emissions units (EUs) K001 (Paint spray booth #1) and K002 (Paint spray booth #2) have not been operating in compliance with permit terms and conditions, due to the fact that the required monthly recordkeeping is not being performed for these EUs. In addition, RAPCA has determined that The Walker Auto Group, Inc. has not submitted the required documentation to RAPCA or retained the required documentation on site, for Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-21-18, Commercial Motor Vehicle and Mobile Equipment Refinishing Operations.

Specifically, Part II.C.1. of the Permits to Operate (PTOs) issued on February 2, 2006 for EUs K001 and K002 state that the permittee shall collect and record the following information each month for these coating operations:

- a. The name and identification number of each coating, as applied;
- b. The VOC content of each coating in lbs/gallon, as applied;
- c. The number of gallons of each coating employed; and
- d. The total VOC emissions from all coatings employed, in lbs or tons.

During the RAPCA inspection performed on January 13, 2010, The Walker Auto Group, Inc. was not keeping monthly records as required by the PTOs for EUs K001 and K002. The Walker Auto Group, Inc. was only able to provide purchase records from your paint supplier during this inspection. Failure to keep the required monthly records is a violation of the PTOs issued February 2, 2006, for EUs K001 and K002, and Ohio Revised Code (ORC) 3704.05.

OAC rule and MCCGHDAPCR section 3745-21-18(E)(1) requires that each owner or operator subject to the provisions of this rule submit documentation sufficient to demonstrate that high efficiency transfer

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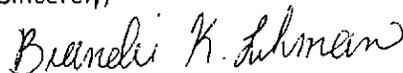
application techniques of coatings required in this rule are in use at their facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio EPA district office or local air agency (RAPCA). In addition, the owner or operator shall retain the documentation on site and make the documentation available to the appropriate Ohio EPA district office or local air agency (RAPCA) upon request. OAC rule and MCGHDAPCR section 3745-21-18(E)(2) requires that each owner or operator subject to the provisions of this rule maintain records for a period of five (5) years of the amount and VOC content of each coating employed and report to the director all emissions in excess of the limits specified in the table of this rule within forty-five (45) days after each exceedance is discovered.

To date, RAPCA has not received the required documentation for OAC rule and MCGHDAPCR section 3745-21-18(E)(1) from The Walker Auto Group, Inc. and this documentation, as well as, the records required by OAC rule and MCGHDAPCR section 3745-21-18(E)(2) were not made available to RAPCA during the January 13, 2010 inspection. Failure to submit the required documentation to RAPCA and failure to retain the required information on site are violations of OAC rule and MCGHDAPCR section 3745-21-18 and ORC 3704.05.

In order to resolve the above mentioned violations, RAPCA is requesting that The Walker Auto Group, Inc. submit a compliance plan and schedule within fourteen (14) days after receipt of this letter. This plan shall include, at a minimum, measures that have been or will be taken by The Walker Auto Group, Inc. to ensure that all required records are being maintained, per the PTOs issued February 2, 2006 for EUs K001 and K002 and per OAC rule and MCGHDAPCR section 3745-21-18. In addition, The Walker Auto Group, Inc. shall submit all documentation required by OAC rule and MCGHDAPCR section 3745-21-18 to RAPCA within 14 days after receipt of this letter. Furthermore, due to the fact that EU K003 (Rustproofing Spray Booth) was placed on registration permitting status with Ohio EPA on April 1, 2000, RAPCA would like The Walker Auto Group, Inc. to submit an updated Emissions Activity Category (EAC) form for Surface Coating Operations for EU K003 in order to reevaluate the permitting needs of this EU.

Enclosed with this letter is a Surface Coating Operations EAC form to be completed for EU K003 and a copy of OAC rule 3745-21-18, for your review. 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

Enclosure

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:

Charles Middleton
 The Walker Auto Group, Inc.
 8457 Springboro Pike
 Miamisburg, Ohio 45342

2. Article Number
 (Transfer from service label) **7008 1300 0001 9323 3297**

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 Addressee

Bertie Gray

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Bertie Gray

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Form 3811, February 2004

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