



REGIONAL AIR POLLUTION CONTROL AGENCY

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April 23, 2010

Certified Mail

Ron Burns

Pro Line Finishing

8641 Washington Church Road

Miamisburg, OH 45342

Notice of Violation (non-HPV)

Summary:

On December 30, 2009, the Regional Air Pollution Control Agency (RAPCA) performed an inspection of Pro Line Finishing (Pro Line), Ohio EPA Facility ID 0857093297, located at 8641 Washington Church Road in Miamisburg, Ohio. As a result of this inspection, RAPCA has documented several violations of state and local air pollution control regulations, as well as, Permit-to-Install and Operate (PTIO) P0103971 for emissions units (EUs) K001 (Paint Booth #1) and K002 (Paint Booth #2). Pursuant to state and local air pollution control regulations, enforcement orders may be issued in the future to resolve these violations.

Dear Mr. Burns:

On December 30, 2009, the Regional Air Pollution Control Agency (RAPCA) performed an announced inspection of Pro Line Finishing (Pro Line), Ohio EPA Facility ID 0857093297, located at 8641 Washington Church Road in Miamisburg, Ohio. As a result of this inspection and further records review, RAPCA has identified numerous exceedances of the eight (8) gallons per day coating usage limitation for emissions units (EUs) K001 (Paint Booth #1) and K002 (Paint Booth #2), as well as, the use of a coating with an organic compounds (OC) content, as applied, greater than the OC content limitation provided in permit terms and conditions for EUs K001 and K002. RAPCA also documented record keeping and reporting violations for these EUs.

Specifically, Part C.1.b.1. for EU K001 and Part C.2.b.1. for EU K002 of Permit-to-Install and Operate (PTIO) P0103971, issued December 4, 2008, as well as, Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-21-09(U)(2)(e)(i), state that the coating material usage for each of these EUs shall be less than 8 gallons per day for the coating of miscellaneous metal parts.

As a result of the inspection conducted by RAPCA on December 30, 2009, RAPCA requested that Pro Line submit all 2009 coating usage records for EUs K001 and K002. RAPCA received these requested records on February 1, 2010. RAPCA thoroughly reviewed these records on March 4, 2010 and according to the records provided, Pro Line exceeded the 8 gallons per day coating usage limitation on 24 separate days for EU K001 in 2009 (the highest usage date being March 13, 2009 with 17.50 gallons applied) and on 11 separate days for EU K002 in 2009 (the highest usage date being June 1, 2009 with 19.00 gallons applied). The above noted exceedances of the 8 gallons per day coating material usage limitation for EUs K001 and K002 are violations of PTIO P0103971, OAC rule and MCCGHDAPCR section 3745-21-09(U)(2)(e)(i) and Ohio Revised Code (ORC) 3704.05. A table of all exceedances documented from the 2009 coating usage records provided by Pro Line is attached to this letter.

Part C.1.e.2. for EU K001 and Part C.2.e.2. for EU K002 of PTIO P0103971 state that Pro Line shall notify RAPCA in writing of any daily record showing that either of the coating lines employed more than the applicable maximum daily coating usage limit of 8 gallons per day. The notification shall include a copy of such record and shall be sent to RAPCA within forty-five (45) days after the exceedance occurs. RAPCA received no notifications from Pro Line for any of the above noted exceedances for EUs K001 or K002 until receiving the 2009 coating usage records on February 1, 2010. These failures to notify RAPCA, in writing, of the exceedances of the 8 gallons per day coating usage limitation for EUs K001 and K002, within 45 days after the each exceedance occurred, are violations of PTIO P0103971 and ORC 3704.05.

Part C.1.d.3. for EU K001 and Part C.2.d.3. for EU K002 of PTIO P0103971 require Pro Line to collect and record the following information for each month for each of these EUs:

- a. The name and company identification of each new cleanup material employed.
- b. The number of gallons of each new cleanup material employed.
- c. The OC content of each new cleanup material employed, in pounds per gallon.
- d. The total OC emissions from all new cleanup materials employed, in pounds.
- e. The number of gallons of spent cleanup material disposed of as waste or drummed for shipment off-site and not processed by Pro Line's on-site solvent reclamation unit.
- f. The total OC emissions from spent cleanup materials disposed of as waste or drummed for shipment off-site and not processed by Pro Line's on-site solvent reclamation unit, in pounds.
- g. The total monthly OC emissions from cleanup operations, in pounds.

During the inspection performed on December 30, 2009, RAPCA determined that Pro Line uses MEK as a cleanup material and occasionally uses isopropyl alcohol to wipe down parts prior to painting them. The records that Pro Line provided as a result of the December 30, 2009

inspection do not currently include any cleanup material usage. Total OC emissions for each of the EUs cannot be determined until cleanup material usage (i.e., MEK and isopropyl alcohol usage) is included in Pro Line's records, as required. This failure to record the required information regarding cleanup materials usage for EUs K001 and K002 is a violation of PTIO P0103971 and ORC 3704.05.

Part C.1.b.2.a.i. for EU K001 and Part C.2.b.2.a.i. for EU K002 of PTIO P0103971 require that the OC content, as applied, of any coating material used not exceed 5.83 pounds per gallon. RAPCA requested a copy of the Material Safety Data Sheet (MSDS) for the coating material with the highest OC content listed within Pro Line's electronic records (DOD-P-15328 D). The electronic records provided show that this material has a volatile organic compounds (VOC) content of 5.76 pounds per gallon. According to the MSDS provided to RAPCA for this coating, as packaged, this coating has a VOC content of 5.89 or 5.95 pounds per gallon. Pro Line stated that a catalyst is then mixed with this material before the coating is applied. As mixed with the catalyst, the VOC content for this coating, as applied, is 6.1 pounds per gallon. Since all VOCs are OCs, RAPCA can conclude that Pro Line is using a coating with an OC content greater than 5.83 pounds per gallon, as applied. This use of a coating material with an OC content greater than 5.83 pounds per gallon, as applied, is a violation of PTIO P0103971 and ORC 3704.05.

On February 18, 2010, RAPCA received an Annual Permit Evaluation Report (PER) from Pro Line for the 2009 calendar year. This PER stated that Pro Line experienced no deviations from operational restrictions or emission limitations provided in PTIO P0103971 for EUs K001 or K002 in 2009. It also stated that Pro Line had no deviations of the monitoring, record keeping, or reporting requirements of the PTIO for EUs K001 or K002. As a result of the December 30, 2009 inspection conducted by RAPCA at Pro Line and subsequent records review, multiple deviations from permit terms and conditions, as discussed above, have been documented for the 2009 calendar year.

In order to resolve the above mentioned violations, RAPCA requires that Pro Line submit a compliance plan and schedule to bring EUs K001 and K002 into compliance with all permit terms and conditions. At a minimum, Pro Line shall submit:

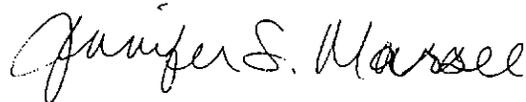
- a. A plan to ensure that the 8 gallons per day coating usage limitation for EUs K001 and K002 is not exceeded in the future and also a plan to ensure that if any exceedances do occur, they are properly reported to RAPCA.
- b. All coating usage records for EUs K001 and K002 from January 1, 2010 through the present (RAPCA also requests that Pro Line re-review all coating usage records from December 4, 2008 through the present to ensure that all exceedances of the 8 gallons per day usage limitation have been reported to RAPCA).

- c. A plan to record the required cleanup materials usage information for EUs K001 and K002 and an example of the monthly cleanup materials usage records that will be maintained on site.
- d. A plan to return to compliance with the OC content limit for all coatings, as applied, which can include measures to be taken by Pro Line to ensure that only compliant coatings are used or, if necessary, a request from Pro Line for a permit modification to adjust the OC content limitation if possible.
- e. Revised 2008 and 2009 Annual PERs. These PERs shall take into account all deviations that Pro Line had from PTIO P0103971 terms and conditions for calendar years 2008 (from December 4, 2008 through December 31, 2008) and 2009 for EUs K001 and K002.

The compliance plan and schedule shall be submitted expeditiously, but in no event later than thirty (30) calendar days after receipt of this letter. Acceptance of the compliance plan and schedule by RAPCA does not constitute a waiver of the Ohio EPA's and RAPCA's authority to pursue civil penalties as provided in sections 3704.06 and 3707.49 of the Ohio Revised Code. The determination whether or not to pursue such penalties will be made by Ohio EPA and RAPCA at a later date.

If you have any questions concerning this matter, please contact Brandie K. Lehman or me at (937) 225-4435.

Sincerely,



Jennifer S. Marsee
Supervisor, Abatement Unit
Regional Air Pollution Control Agency

Cc:	John Paul	RAPCA
	Jefferis Canan	RAPCA
	Michael Matis	PHDMC
	Lisa Holscher	U.S. EPA
	Tom Kalman	Ohio EPA

Pro Line Finishing
0857093297

Calendar Year 2009 Exceedances of the 8 gallons per day
coating usage limit for K001 & K002

K001

Date	Total Usage (gal/day)
1/14/2009	9.75
2/17/2009	9.00
3/13/2009	17.50
4/1/2009	10.00
4/25/2009	9.25
5/1/2009	9.00
5/4/2009	8.25
5/12/2009	10.75
5/27/2009	8.50
6/10/2009	8.75
6/15/2009	8.25
6/19/2009	11.00
6/22/2009	11.00
7/14/2009	11.00
7/22/2009	9.75
7/28/2009	9.00
7/29/2009	10.50
7/30/2009	14.00
8/3/2009	8.75
8/5/2009	14.25
8/6/2009	8.50
8/20/2009	12.50
8/24/2009	10.25
11/4/2009	8.50

K002

Date	Total Usage (gal/day)
2/17/2009	8.50
2/18/2009	8.50
2/25/2009	9.08
3/11/2009	10.75
4/27/2009	9.50
5/7/2009	9.75
6/1/2009	19.00
7/7/2009	9.25
12/9/2009	10.00
12/11/2009	10.50
12/16/2009	9.50

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Ron Burns
 Pro Line Finishing
 8641 Washington Church Road
 Miamisburg, Ohio 45342

PS Form 3800, August 2006 See Reverse for Instructions

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 Pro Line Finishing
 8641 Washington Church Road
 Miamisburg, Ohio 45342

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