



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 23, 2010

Certified Mail

Jack Parnell

Industrial Fiberglass Specialties, Inc.

521 Kiser Street

Dayton, Ohio 45404

RE: Ohio EPA Premises No. 0857043336 (IFS)
Ohio EPA Premises No. 0857045007 (EPD)
Full Compliance Evaluation (FCE) February 18, 2010

Dear Mr. Parnell:

WARNING LETTER

On February 18, 2010, the Regional Air Pollution Control Agency (RAPCA) conducted a Full Compliance Evaluation (FCE) of the Industrial Fiberglass Specialties, Inc. (IFS) facility located at 521 Kiser Street and the Energy Power Division (EPD) facility located at 351 Deeds Avenue in Dayton, Montgomery County, Ohio. The purpose of the inspection was to determine both facilities' compliance with all applicable air pollution control regulations and permit terms and conditions. The purpose of this letter is to address and seek resolution for issues discovered during the course of the inspection and subsequent follow up activities. Specifically, IFS records submitted to RAPCA following the inspection indicate that IFS employed two resins in October of 2009 that exceed the styrene content limit of 34.5% in emissions unit (EU) P004 (FRP Contact Molding Station No. 2) and failed to report these deviations. Additionally, it was evident during the inspection that IFS and EPD, which are permitted as two separate facilities, were not independent processes and did, indeed, support each other operationally.

Pursuant to Part C.4(c)(1), *Operational Restrictions*, of Permit-to-Install and Operate (PTIO) 08-04928, issued August 13, 2008 for EU P004, the styrene concentration of resins employed in this EU shall not exceed 34.5 %, as applied. Based on information contained in IFS's October 2009 usage records, submitted to RAPCA via email on March 25, 2010, IFS employed two resins in EU P004 that exceed the styrene content limit for this EU. These records indicate that 1999.50 pounds of 470-300/Vex229-041/8550-Blend (35.52% styrene) and 795.50 pounds of 470-300/Vex229-041/8084-Blend (35.19% styrene) were employed in October of 2009. **Employing resins that exceed the styrene concentration limit in EU P004 is a violation of PTIO 08-04928 and ORC 3704.05.**

IFS submitted an administrative modification application for PTIO 08-04928 on March 25, 2010, requesting an increase in the styrene content limit for EU P004. RAPCA issued a follow up letter on April 28, 2010, requesting additional information necessary to process this application. On June 25, 2010, IFS requested that RAPCA cancel review of the administrative modification application and indicated that a

new permit modification application would be submitted in the near future. Until a new permit application is processed and a PTIO modification to PTIO 08-04928 has been issued, IFS must continue to comply with all permit terms and conditions provided in the current PTIO.

Additionally, part C.4(e)(2), *Reporting Requirements*, of PTIO 08-04928 requires that IFS submit quarterly deviations reports that identify:

- a) Any resins applied in EU P004 with a styrene concentration that exceeds 34.5%.
- b) The probable cause of each deviation.
- c) Any corrective action(s) that were taken to remedy the deviation(s) or prevent future deviation(s).
- d) The magnitude and duration of each deviation.

IFS failed to identify the deviations detailed above in the 2009 fourth quarter deviation report as required by part C.4(e)(2) of the current PTIO. **Failure to report these deviations as required is a violation of PTIO 08-04928 and ORC 3704.05.**

IFS submitted the annual Permit Evaluation Report (PER) on May 13, 2010, covering the reporting period of April 1, 2009 through March 31, 2010. IFS checked the boxes indicating there were no deviations of operational restrictions or reporting requirements, when indeed there were. **Failure to identify the above deviations in the May 13, 2010 PER is a violation of PTIO 08-04928 and ORC 3704.05. At this time, RAPCA requires that IFS submit a revised fourth quarter 2009 deviation report and PER identifying these deviations and including all required information pertaining to these deviations.**

The IFS records submitted to RAPCA on March 25, 2010, contain usage information for the cleanup material acetone for the months of May, October and November of 2009. RAPCA noted that the reported amount of acetone employed for cleanup (in US gallons) was equivalent to the reported amount of organic compound (OC) emissions (in pounds) from acetone for both the monthly and annual rolling numbers. Based on a material safety data sheet (MSDS), acetone has an OC content of approximately 6.6 pounds per gallon. **RAPCA requires that IFS recalculate the OC emissions from acetone usage based on the correct OC content of acetone and submit revised records.**

On April 7, 2010, RAPCA issued a certified letter to EPD addressing discrepancies between statements made in previous correspondence with RAPCA and actual work practices observed during the February 18, 2010 inspection, concerning the determination that EPD and IFS are two separate facilities. On May 6, 2010, RAPCA received EPD's response to RAPCA's April 7 letter, in which EPD stated that RAPCA's finding that the two facilities operationally supported one another was premature considering installation of the only permitted unit at EPD, EU P001 (Pipe Winder No. 1), was not complete. While RAPCA understands that EU P001 has yet to be installed at EPD, we caution that continued operational support between EPD and IFS, once this unit is installed, will result in RAPCA's determination that the two locations operate as one facility and, therefore, must be permitted as such.

If determined to be one facility, IFS's and EPD's potential and actual emissions will be combined for permitting purposes. Due to IFS's permitted limit for individual hazardous air pollutant (HAP) emissions, the installation of EPD's EU P001 would increase IFS's potential individual HAP emissions to greater than

Industrial Fiberglass Specialties, Inc.

September 23, 2010

Page 3

10 tons per year (TPY). Potential individual HAP emissions greater than 10 TPY would make IFS a major source and would trigger Title V permitting requirements and compliance with 40 CFR Part 63 Subpart WWWW [National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production]. RAPCA would like to point out that once a facility becomes subject to a major source NESHAP, they are always subject regardless of changes in potential or actual HAP emissions.

Your prompt attention to this matter is greatly appreciated. Please respond to the issues specified in this letter, including the requested revised reports and records within 30 days following receipt of this letter. Thank you for your time and cooperation. In addition, we ask that you inform RAPCA when the installation of EU P001 is complete at EPD.

Thank you for your time and cooperation. If you have any questions regarding this matter feel free to contact me at (937)225-4453.

Sincerely,



Lesley A. Jenkins

Air Pollution Control Specialist

cc: Jeff Canan, RAPCA
Tom Kalman, OEPA
Lisa Holscher, USEPA



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. 	A. Signature <input checked="" type="checkbox"/> <i>Jack Parnell</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Jack Parnell Industrial Fiberglass Specialties, Inc. 521 Kiser Street Dayton, Ohio 45404	B. Received by (Printed Name) C. Date of Delivery DARLA AUDWELL 9-24-10 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number (Transfer from service label)	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.
7010 1060 0000 0187 4940	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total	Postmark Here
Sent To Jack Parnell Industrial Fiberglass Specialties, Inc. Street, or PO E 521 Kiser Street City, St. Dayton, Ohio 45404	PS Form 3800, August 2006 See Reverse for Instructions

7010 1060 0000 0187 4940

