





**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

Re: Wood County
SLS Electric
Notice of Violation (NOV/non-HPV)

May 11, 2012

Mr. Steve Lauber, President
SLS Electric
550 4th Street
Ampoint Industrial Park
Perrysburg, Ohio 43551

Dear Mr. Lauber:

This letter shall serve as a follow-up to the complaint investigation on April 23, 2012, and subsequent phone conversations that have occurred regarding the above-referenced facility. The reason for the site visit and phone conversations was to determine the compliance status of the emission units that are operating at SLS Electric (herein referred to as SLS) with the rules and regulations of Division of Air Pollution Control (DAPC) based on a complaint lodged against SLS.

The findings are based on information provided over the phone since there were no personnel who could accompany me through SLS during the site visit. The findings are summarized as follows:

1. SLS provides repair and rewind services of AC/DC motors, transformers, specialty coils, and supplying of new or rebuilt electrical apparatus. The operations at SLS began in 2002.
2. There are a number of air contaminant sources that operate at SLS. The sources that exist at the facility are a spray booth, a burn-off oven, a varnish dip tank and three bake ovens.
3. Based on the information from our phone conversation, it appears that the spray booth may not require permitting through DAPC due to the coating usage amount that can potentially be sprayed on a given day. A worksheet will be sent with this letter that should be used to maintain a log of coating usage on a daily basis. This will enable SLS to demonstrate de minimis status pursuant to Ohio Administrative Code (OAC) 3745-15-05. If SLS can demonstrate that emissions from the spray booth are de minimis, then SLS will not be required to obtain a Permit-To-Install and operate (PTIO).
4. It is uncertain whether the varnish dip tank and/or the bake ovens will require a PTIO at this time. Please submit emission calculations from these sources in order for a determination to be made.

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5. SLS operates a burn-off oven model number PTR 260 1355 which has an afterburner that reaches 1200 degrees Fahrenheit. This oven was manufactured in 1984 by Pollution Control products Co. in Dallas, Texas. Based on DAPC regulations, this emissions unit will require permitting since there are no applicable permitting exemptions for this type of source. At this time, SLS is in violation of OAC rule 3745-31-02 and Ohio Revised Code (ORC) 3704.03 for installing and operating an air contaminant source prior to obtaining a permit. SLS is required to submit a complete PTIO application, Emissions Activity Category (EAC) form and process flow diagram in order to initiate a permit for this unit. Permit applications can be downloaded from Ohio EPA's website at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.
6. Please note that Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) that may be able to assist you in coming into compliance with the rules and regulations of DAPC. Additional information about this office can be found at <http://www.epa.ohio.gov/ocapp> or by calling OCAPP at 1-800-329-7518. The OCAPP representative at NWDO is Mr. Ron Nabors and he can be contacted at (419) 373-3147 or at ron.nabors@epa.state.oh.us.

The information requested above should be submitted to my attention by no later than June 22, 2012. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns regarding this letter, please feel free to call me at (419) 373-3118 or e-mail at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

Enclosure

ec: Bruce Weinberg, DAPC-CO
Jennifer Jolliff, DAPC-NWDO
Ron Nabors, OCAPP-NWDO
Steve Lauber
Tom Kalman, DAPC-CO
William MacDowell