





**Environmental
Protection Agency**

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

Re: Wood County
Kiemle-Hankins
Notice of Violation (NOV/non-HPV)

May 11, 2012

CERTIFIED MAIL

Mr. J. David Fowler, Division Manager
Kiemle-Hankins
94 H Street
Ampoint Industrial Park
Perrysburg, Ohio 43551

Dear Mr. Fowler:

This letter shall serve as a follow-up to the complaint investigation on April 23, 2012, and subsequent e-mail correspondences that have occurred regarding the above-referenced facility. The reason for the site visit was to determine the compliance status of the emission units that are operating at Kiemle-Hankins (herein referred to as K-H) with the rules and regulations of Division of Air Pollution Control (DAPC).

The findings are based on information provided during the site visit, my observations during the investigation as well as e-mail correspondence and can be summarized as follows:

1. K-H provides repair and rewind services of AC/DC motors, transformers, specialty coils, and supplying of new or rebuilt electrical apparatus.
2. There are a number of air contaminant sources that operate at K-H. The sources that exist at the facility are a spray booth, two burn-off ovens, a varnish dip tank and two bake ovens.
3. It is unknown at this time whether the spray booth requires permitting through DAPC. 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 K-H to demonstrate de minimis status pursuant to Ohio Administrative Code (OAC) 3745-15-05. If K-H can demonstrate that emissions from the spray booth are de minimis, then K-H 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 would require a permit at this time. Please submit emission calculations from these sources in order for a determination to be made.

5. K-H operates two burn-off ovens, each having an afterburner that reaches 1400 degrees Fahrenheit. Based on DAPC regulations, these emissions units will require permitting because there are no applicable permitting exemptions for these types of sources. At this time, K-H is in violation of OAC rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05 for installing and operating an air contaminant sources prior to obtaining PTIOs. K-H is required to submit a complete PTIO applications, Emissions Activity Category (EAC) forms and process flow diagrams in order to initiate permits for these units. Permit applications can be downloaded from Ohio EPA's website at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.
6. As you may be aware, K-H has another branch in Dayton (Facility ID #0857731282) that has two burn-off ovens that have been recently permitted. K-H also had a branch in Fairfield, Ohio that shut down operations in 2007. Based on K-H's website, it appears that there is another branch in Lima, Ohio that may need to be inspected in the future to determine that location's compliance status.
7. 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
Daniel J. D'Amico
J. David Fowler
Jeffrey Skebba, DAPC-NWDO
Jennifer Jolliff, DAPC-NWDO
Ron Nabors, OCAPP-NWDO
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