



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Allen County
Accubuilt, Inc.
Premise No. 0302020314
Notice of Violation Close Out/HPF

April 12, 2007

Mr. Dennis Schlueter, Executive Vice President
Accubuilt, Inc.
2550 Central Point Parkway
Lima, Ohio 45804-3890

Dear Mr. Schlueter:

The Division of Air Pollution Control (DAPC) has reviewed Accubuilt, Inc's letter dated March 29, 2007, which contains a response to DAPC's February 27, 2007, Notice of Violation (NOV). The NOV was issued for violation of the organic compound (OC) emissions limitation of 16.5 tons OC per year, group limit for emissions units R001 through R012 gluing operations. This violation of the Title V permit, Permit to Install (PTI) No. 03-17125 and ORC 3704.03 had occurred for calendar year 2006.

The company indicated the corrective actions it has taken include the following:

1. Vehicle production has leveled off. Anticipated OC emissions for gluing operations for these 12 emissions units should be approximately 14.4 tons in 2007; and
2. Company management personnel will do a more thorough review of the OC emissions data (quarterly basis) and manage vehicle production scheduling to ensure that this group emissions limitation is not exceeded. If it becomes evident that future vehicle production increases are necessary, a PTI application would be submitted for additional gluing stations and/or the current gluing stations' OC emissions limit would be increased through a PTI modification.

Due to the minimal amount of excess emissions and prompt corrective actions taken, DAPC will exercise enforcement discretion at this time. However, please note that this is the second similar violation of OC emissions limitations for gluing operations within the past year (violation noted in August 30, 2006, NOV for emissions unit R012). Should additional violations occur in the future, these violations could still be included in an enforcement action.

Mr. Dennis Schlueter, Executive Vice President

April 12, 2007

Page 2

If you have any questions, feel free to contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/llr

pc: Tom Kalman, DAPC/CO
Lisa Holscher, U.S. EPA - Region V
Don Waltermeyer, DAPC/NWDO
DAPC/NWDO File