



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Allen County
Accubuilt, Inc.
Premise #0302020314
Notice of Violation/HPF

February 27, 2007

CERTIFIED MAIL

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/Northwest District Office (DAPC/NWDO) has reviewed the following Title V permit reports which were submitted by Accubuilt, Inc. (Accubuilt) on January 24, 2007 (received on February 6, 2007):

- fourth quarter 2006 deviation report;
- semi-annual deviation report for second half 2006; and
- annual organic compounds (OC) emissions report for 2006.

The annual OC report indicated that combined OC emissions from gluing operations for emissions units R001 through R012 were approximately 17.9 tons for calendar year 2006, based on emission factors contained in the company's Title V permit. This emissions total is greater than the applicable combined emissions limit of 16.5 tons OC per year for these 12 emissions units.

DAPC/NWDO concurs with Accubuilt that the emission factors for the gluing operations have a built-in safety factor of 20 percent, as was established during the Title V permit review. Thus, it is possible actual OC emissions may vary due to use of these emissions factors since, as requested by the company, the facility is tracking the number of vehicles produced instead of the actual usage rate of all glues employed.

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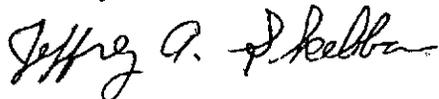
The company and Ohio EPA agreed on this permitting approach and we are assuming that the figure of 17.9 tons of OC represents a reasonable estimate of actual emissions. This is a violation of the following permit terms and regulations:

- Part III - term and condition A.I.1 in the Title V permit with effective date of December 18, 2002, which limits the gluing operations to 16.5 tons OC per year for emissions units R001 through R012 combined;
- Part II - special term and condition A.1 in permit to install No. 03-17125 (same emissions limit as shown in Title V permit); and
- Ohio Revised Code 3704.03

Please submit a written response by March 30, 2007, which includes a compliance plan for bringing emissions units R001 through R012 back into compliance.

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. Should you have any questions or comments, 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
Jim Orlemann – DAPC-CO
Lisa Holscher - U.S. EPA Region V
Don Waltermeyer – DAPC-NWDO
DAPC-NWDO File
NWDO Follow-up File

0302020314 Accubuilt Inc. 2/27/07

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Article Description: *General Industrial, Inc.*
 Return Address: *GENERAL INDUSTRIAL, INC.*
1000 CENTRAL PIKE PARKWAY
LEWIS, OH 45864-3890

PS Form 3800, June 2002 See Reverse for Instructions

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. 	<p>A. Signature <i>*J. Kinste</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>J. Kinste</i></p> <p>C. Date of Delivery <i>2-28-07</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to: <i>GENERAL INDUSTRIAL, INC.</i> <i>1000 CENTRAL PIKE PARKWAY</i> <i>LEWIS, OH 45864-3890</i></p>	<p>3. Service Type <input checked="" 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.</p>
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