



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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

Re: Allen County  
American Trim, LLC – Plant No. 2  
Premise #0302020155  
Return to Compliance

September 10, 2008

Mr. Michael Wittman, Corporate Environmental Engineer  
American Trim, LLC  
1501 Michigan Street  
Sidney, Ohio 45365

Dear Mr. Wittman:

The Division of Air Pollution Control/Northwest District Office (DAPC/NWDO) has reviewed American Trim LLC's letter dated July 23, 2008. The letter was submitted in response to the letter issued by DAPC/NWDO on July 1, 2008 regarding citizen complaints of alleged odors from the facility. In addition, an inspection of the facility was completed by Jeffrey Skebba of DAPC/NWDO on September 3, 2008 to confirm exhaust stack modifications for the natural gas fired drying ovens for the miscellaneous metal parts roll coating operation, emissions unit K002.

The following is a summary of our findings:

1. Records submitted for January through May 2008 of daily coating material usage, cleanup material usage and volatile organic compound (VOC) emissions indicated that compliance is being maintained with the emissions limitations of 134.16 pounds VOC per day from coating materials and 725 pounds VOC per month from cleanup materials, in permit to install No. 03-0397.
2. The company submitted SCREEN3 dispersion modeling data for emissions unit K002 for three pollutants – naphthalene, toluene and xylene. The data indicated that predicted concentrations for naphthalene and toluene would exceed the respective maximum acceptable ground level concentration (MAGLC) if the rain caps on the existing exhaust stacks would remain in place.

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Due to the predicted concentrations exceeding the MAGLC, the company completed a second modeling scenario using SCREEN3 with the assumption that the rain caps would all be removed and all drying oven stacks' be raised to a minimum of 10 feet above roof level. This modeling scenario resulted in predicted concentrations of naphthalene, toluene and xylene all being less than the MAGLC values. DAPC/NWDO concurs that the modeling input and output data is correct.

3. Each of the 12 exhaust stacks for the drying ovens on emissions unit K002 were modified by removing the rain caps and increasing each stack height to a minimum of 10 feet above roof level. During the September 3, 2008 inspection, it was confirmed that these stack modifications have been properly completed.
4. There were no odors detected downwind of the exhaust stacks for emissions unit K002 which was in operation during the September 3, 2008 inspection.

Based on the company's response, and the action plan provided, we have determined that the compliance plan is acceptable, including stack height increases, removal of rain caps and proper dispersion modeling data. All of the requested information for emissions unit K002 has been submitted, and this emissions unit is being operated in compliance with air pollution control regulations of the Ohio EPA at this time.

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

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~~pc: DAPC-NWDO File~~