



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
American Trim
Product Center No. 2
Premise No. 0302020155
Notice of Violation Close Out

June 21, 2007

Mr. Thomas Merkle, Environmental Engineer
American Trim - Product Center No. 2
1005 West Grand Avenue
Lima, Ohio 45801

Dear Mr. Merkle:

The Division of Air Pollution Control (DAPC) has reviewed American Trim's, Product Center No. 2, letter dated June 12, 2007 which contains a response to DAPC's June 6, 2007, Notice of Violation (NOV). The NOV was issued for violation of the volatile organic compound (VOC) emissions limitation of 134.16 pounds per day for emissions unit K002 - miscellaneous metal parts coating line. Information submitted by the company indicated that this violation of permit to install No. 03-10397, OAC rule 3745-31-05 and ORC section 3704.03 had occurred on one day, February 1, 2007 due to inadvertent coating of additional parts.

The company also indicated that the actual coating usage on February 1, 2007 was not reported correctly in the April 11, 2007 quarterly report. The correct total was 45.51 gallons, not 116.6 gallons. However, the total VOC emissions for that day were still 151 pounds, which was in violation of the daily VOC emissions limitation.

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

1. Preparation of a master coating list;
2. Review of any new coatings compared to the master coating list prior to use;
3. Advise supervisors and line operators of proper coating use procedures.

DAPC concurs that no physical or operational changes have been made to this emissions unit, and that no modification has occurred. Thus, neither revised potential to emit calculations nor a PTI modification are necessary.

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Due to the minimal amount of excess emissions and prompt corrective actions taken, DAPC will exercise enforcement discretion at this time. Should additional violations occur in the future, this decision by DAPC is not a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. 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

/lb

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