



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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 Korteski, Director

Re: Allen County
American Trim
Product Center No. 2
Premise No. 0302020155
Notice of Violation

June 6, 2007

CERTIFIED MAIL

7006 0100 0003 7708 5459

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/Northwest District Office (DAPC/NWDO) has reviewed the first quarter 2007 deviation report submitted by American Trim - Product Center No. 2 on April 11, 2007. The company reported that volatile organic compound (VOC) emissions from emissions unit K002 - miscellaneous metal parts coating line exceeded the daily emissions limit of 134.16 pounds VOC per day, with a maximum daily emissions total of 151 pounds VOC.

This is a violation of the following:

- emissions limit of 134.16 pounds VOC per day in the Air Emission Summary table in permit to install (PTI) No. 03-10397 issued on July 23, 1997;
- additional special term and condition No. A.1 in PTI No. 03-10397;
- OAC rule 3745-31-05; and
- Ohio Revised Code 3704.03

It appears that the company may have modified this emissions unit without first obtaining a PTI modification, since the maximum daily coating usage reported was 116.6 gallons (summation of base coat, top coat and screenable tape) versus a maximum daily coating total of 99.12 gallons in the 1997 PTI application (summation of base coat at 0.55 gallons per hour, top coat at 0.45 gallons per hour and liquid tape at 3.13 gallons per hour = 4.13 gallons per hour x 24 hrs/day = 99.1 gallons/day).

Mr. Thomas Merkle
June 6, 2007
Page 2

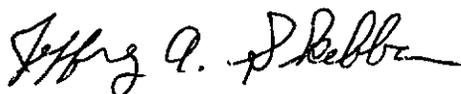
The company stated in the deviation report that it is experimenting with a new coating process for electro-galvanized steel which requires three coatings to be applied. It was also stated that corrective action for the violation would include preparation of a master coating list, and verification of new coatings prior to initial use, along with communicating proper procedures to the supervisors and operators.

Please submit a written response by July 9, 2007 that includes the following:

1. Indicate the total number of days the emissions exceeded 134.16 pounds VOC per day on emissions unit K002 during the first quarter 2007, and the total VOC emissions (in pounds) on each day this occurred;
2. Revised potential to emit VOC and hazardous air pollutant (HAP) calculations for coatings in use on emissions unit K002 which indicate the maximum coating usage, VOC and HAP emissions;
3. If any clean up materials usages have increased, submit revised potential to emit VOC and HAP calculations for clean up materials for emissions unit K002; and
4. Statement of whether the company has modified the emissions unit and needs to apply for a PTI modification.

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

/csl

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

0302020345 American Trim LLC
6/6/07

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MR THOMAS MERKLE

Postage	\$ 41	Postmark Here
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Total Postage & Fees	\$ 5.21	DAPC/Skebba csl

Post To: **AMERICAN TRIM PROD CTR #2**
 Street No.: **1005 WEST GRAND AVE**
 State, ZIP+4: **LIMA OH 45801**

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 <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name): <i>Joyce Merkle</i> C. Date of Delivery: <i>Jun 7</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>MR THOMAS MERKLE ENV ENG AMERICAN TRIM-PRODUCT CENTER NO 2 1005 WEST GRAND AVE LIMA OH 45801</p> <p>DAPC/Skebba/csl</p>	<p>3. Service Type</p> <p><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> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7006 0100 0003 7708 5459</p>