



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

April 18, 2011

Mr. Brian Culler  
Pentair Water  
1101 Myers Parkway  
Ashland, Ohio 44805

Re: Notice of Violation (NOV/non-HPV) - Follow-up to April 7, 2009 inspection of Pentair Water (0303010175)

Dear Mr. Culler:

This letter shall serve as a follow-up to the inspection Tom Cikotte, Chad Winebrenner, and I conducted on April 7, 2011, of Pentair Water. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

1. Regarding emissions unit N001, Term (C)(1) of Permit to Install (PTI) Number 03-17159, issued on December 12, 2006, requires that "The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information: a. the dates the emissions unit was operated b. the number of batches processed for each date the emissions unit was operated; and c. the dates and descriptions of any additional maintenance activities performed on this emissions unit." At the time of our inspection the facility was not accurately maintaining this information, as required in the permit. Failure to maintain this information is a violation of the terms and conditions of permit number 03-17159 and ORC 3704.05.

To remedy this situation, recordkeeping must be revised to show all days that the oven operated in any capacity, not just the days it is operated as a burn-off oven.

2. Also regarding emissions unit N001, two issues were discussed at the time of the inspection that required additional information. First, please verify whether an interlock exists to ensure the temperature of the secondary combustion chamber does not go below 800 F when the unit is used as a burn off oven. Second, please check facility maintenance logs to determine what, if any, additional maintenance has been done to the oven. In the future it would be prudent for the facility to have this information available upon inspection.

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3. Regarding emissions unit K001, PTI 03-4067, requires that the facility shall maintain monthly records that list the following information for each surface coating employed in this source:
  - a. company I.D. of the surface coating.
  - b. the number of Gallons employed per month.
  - c. the VOC content, in percent by volume.
  - d. the VOC density, in pounds per gallon.
  - e. the water content, in percent by volume (of any).
  - f. the non-volatile (solids) content, in percent by volume.
  - g. the pounds of VOC emitted.

At the time of our inspection the facility was not accurately maintaining this information, as required in the permit. Failure to maintain this information is a violation of the terms and conditions of PTI 03-4067 and ORC 3804.05.

To remedy this situation, recordkeeping must be revised to show the percent by volume VOC of the coatings used in source K001.

4. A second grinding area was installed within the facility. Particulate emissions are controlled from multiple grinding stations via a baghouse which vents inside the building. This unit may be "de minimis" or may qualify for an exemption from permitting. To accurately determine that, please provide the volumetric air flow rate through the new baghouse, in ACFM, and the manufacture's designed control efficiency of the baghouse.

The company's written response to this letter is requested by May 19, 2011. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future.

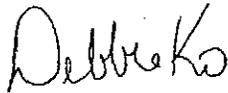
Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I would like to take this opportunity to thank you for escorting us around the facility.

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Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address or call (419) 373-3106.

Sincerely,



Debbie Ko  
Division of Air Pollution Control

/llr

pc: ~~DAPC-NWDO File: Pentair Water Inspection~~

ec: William MacDowell, U.S. EPA Region V  
Tom Kalman, DAPC-CO  
Jennifer Jolliff, DAPC-NWDO