



Environmental
Protection Agency

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

June 17, 2011

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

Re: Ashland County
Pentair Pump, Inc.
Facility ID # 0303010175
Notice of Violation (NOV/non-HPV) – Follow-up to May 19, 2011 letter

Dear Mr. Culler:

We have reviewed the May 17, 2011, response to the April 18, 2011, inspection letter. The flame sensor based interlock control system is not acceptable for replacing the temperature monitoring requirements contained in Pentair Pump's current permit (PTI 03-17159). An acceptable interlock system must be designed to ensure that a minimum temperature is achieved in the secondary chamber prior to operation of the primary chamber burner. The current interlock system only ensures the present of a flame in the secondary chamber which does not adequately demonstrate that the proper temperature achieved.

Pentair pump must either monitor and report the information required by the current permit or install an interlock system that is based on the actual temperature of the secondary chamber. The installation of an acceptable interlock system will require a request for a permit modification to remove the current monitoring and reporting requirements and replace them with appropriate interlock control system requirements. Please respond stating how Pentair Pump proposes to bring this unit into compliance by July 20, 2011. If you have any questions, please contact me at (419) 373-3106.

Sincerely,

Debbie Ko
Division of Air Pollution Control

/llr

pc: ~~DAPC-NWDO File~~