



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korteski, Director

Re: Auglaize County
Kinninger Production Welding
03 06 00 0058
WARNING LETTER

December 17, 2010

CERTIFIED MAIL

Mr. Jack Thobe, President
Kinninger Production Welding
P. O. Box 33
710 Kuenzel Drive
New Bremen, Ohio 45869

Dear Mr. Thobe:

As you know from our recent telephone discussions, the Division of Air Pollution Control (DAPC), in addressing your facility's long-standing air permit renewal application (received in our office in 1997), has examined your facility's ongoing compliance with the requirements of Permit to Install (PTI) 03-10611 issued October 1, 1997, for the metal parts painting /coating operation, emissions unit K001.

PTI 03-10611 was a 'synthetic minor' permit for a Hazardous Air Pollutant (HAP) normally found in water-based coatings, and allowed for short-term usages of up to 10 gallons per hour of coatings, and for 22.4 tons of volatile organic compounds (VOCs) of air emissions. *ANNUAL*

Reporting requirement D.2 in the PTI requires an annual report. To date, our office had not received such reports from the company. Additionally, our telephone discussions indicated a lack of a clear past record of coating usage. Failure to maintain proper coating records and submit annual reports is a violation of PTI 03-10611 and ORC 3704.05. To rectify the violations; the company agreed to check available information such as purchase records and the records from their main paint supplier. A follow-up report was then received from the company by telephone on November 18, 2010, covering the coating usage for the past two years.

For coating usage for calendar year 2009 and so far for 2010, the company reports 200 and 170 gallons, respectively. This reflects usage far below the levels allowed in the PTI, and the company states that this generally reflects historical usage. The agency agrees that, despite the lack of past compliance with record-keeping and reporting requirements, that actual past air permit emissions exceedances has a wide margin of improbability.

Mr. Jack Thobe, President
December 17, 2010
Page 2

Further, 2-butoxyethanol (a.k.a. EGBE - the common organic component in water-based coatings) has since been 'de-listed' as a HAP. The company has therefore now submitted an application for a General Permit (Misc. Metal Parts Painting Line < 10 gpd - GP3.7), and requested the withdrawal of PTI 03-10611. The General Permit has been issued on December 6, 2010.

Based on the company's responsiveness, and consideration of other factors including the unlikelihood of actual air emissions violations, we have determined that no further agency action be taken at this time. In order to ensure ongoing compliance at your facility moving forward, please carefully read your recently issued General Permit (P0107233) and comply with all recordkeeping and reporting requirements.

Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should the company have any questions and/or comments, I may be reached at (419) 373-3117. I may also be contacted electronically by E-mail at: paul.chad@epa.state.oh.us

Sincerely,



Paul Chad
Division of Air Pollution Control

/llr

ec: Jennifer Jolliff, DAPC NWDO
Certified Receipt Number 7009 1410 0001 1840 1560

pc: DAPC NWDO File



[Home](#) | [Help](#) | [Sign In](#)

[Track & Confirm](#)

[FAQs](#)

Track & Confirm

Search Results

Label/Receipt Number: 7009 1410 0001 1840 1560

Service(s): Certified Mail™

Status: Delivered

Your item was delivered at 11:08 am on December 20, 2010 in NEW BREMEN, OH 45869.

Track & Confirm

Enter Label/Receipt Number

Go >

Detailed Results:

- Delivered, December 20, 2010, 11:08 am, NEW BREMEN, OH 45869
- Notice Left, December 18, 2010, 10:05 am, NEW BREMEN, OH 45869
- Arrival at Unit, December 18, 2010, 10:04 am, NEW BREMEN, OH 45869

Notification Options

Track & Confirm by email

Get current event information or updates for your item sent to you or others by email. [Go >](#)

7009 1410 0001 1840 1560

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 49
Certified Fee	2.80
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 32

Sent To: *MARKTHABE - Kinninger Production Welding*
 Street, Apt. No.:
 or PO Box No. *710 KUENZEL DR - P.O. Box 33*
 City, State, ZIP+4:
NEW BREMEN, OH 45869

U.S. Form 3800, August 2005 See Reverse for Instructions