



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 12, 2009

CERTIFIED MAIL
7002 2410 0003 1155 9741

Mr. Doug Smith, President
Checkmate Marine, Inc.
3691 St. Rt. 4
P.O. Box 351
Bucyrus, Ohio 44820-0351

RE: Notice of violation (NOV) based on April 21, 2009 inspection of Checkmate Marine, Inc. (0317010112) with response due by June 9, 2009.

Dear Mr. Smith:

This letter shall serve as a follow-up to the inspection I conducted on April 21, 2009, of the above referenced facility. 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. Ohio EPA was notified in a letter dated November 7, 2007, that Checkmate Marine, Inc. (Checkmate) had switched compliance options under 40 CFR Part 63, Subpart VVVV from using compliant gelcoats and resins to the emissions averaging option. The company began doing so in September 2007. The change in compliance method was due to gelcoat drying times taking significantly longer when using compliant materials.

A review of Ohio EPA's records for the facility confirm that Checkmate has been submitting quarterly and semi-annual deviation reports, specific to the Title V permit, in accordance with the General Terms and Conditions of the permit, effective June 9, 2006. However, Checkmate is also required to submit semi-annual compliance reports, specific to the MACT, in accordance with 40 CFR Part 63.5764. These reports, specifically the information required in them, have not been submitted on a semi-annual basis.

This failure to properly document compliance with the MACT requirements is a violation of 40 CFR Part 63.5764, Checkmate's Title V permit and ORC 3704.05. Ohio EPA requests that Checkmate submit semi-annual compliance reports in accordance with 40 CFR Part 63.5764 dating back to March 1, 2007, when the change in ownership occurred. It should be noted that during the inspection, a review of Checkmate's records demonstrated it was operating in compliance with emissions averaging requirements required in the MACT during that timeframe.

Mr. Doug Smith, President
May 12, 2009
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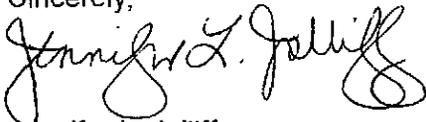
2. It has previously been discussed that the reporting requirements outlined in the MACT were inadvertently omitted from the facility's current TV renewal permit. Checkmate will need to submit a Title V correction via Air Services so that the permit can be reopened to include these requirements. The reopening will require the permit to go through the three-step draft process again prior to being issued final. It should be noted that the unintentional omission of these reporting requirements does not relieve Checkmate of their full responsibility to comply with 40 CFR Part 63, Subpart VVVV.

NWDO requests that Checkmate submit the requested semi-annual compliance reports and Title V correction information no later than **June 9, 2009**.

Based on my observations and the information reviewed during the inspection, with the exception of the violation noted above, the company appears to be operating in compliance with air pollution control regulations of the Ohio EPA at this time.

I would like to take this opportunity to thank Dean Reynolds and John Berent for escorting me around the facility. If you have any questions or comments, please contact me at the above address or call (419) 373-4112.

Sincerely,



Jennifer L. Jolliff
Division of Air Pollution Control

JLJ/csl

pc: Sam Araj, NWDO, DAPC
Don Waltermeyer, NWDO, DAPC
Thomas Kalman, CO, DAPC
Lisa Holscher, US EPA
NWDO DAPC Inspection file

5/12/09

Checkmate Marine

0317010112

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<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 <i>*Smith</i></p> <p>B. Received by (Printed Name) C. Date of Delivery <i>LINDA SMITH 05/14/09</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes if YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>MR DOUG SMITH PRESIDENT CHECKMATE MARINE INC 3691 ST RT 4 PO BOX 351 BUCYRUS OH 44820-0351</p> <p>DAPC/Jennifer J./csl</p>	<p>3. Service Type <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>7002 2410 0003 1155 9741</p>

PS Form 3811, February 2004

Domestic Return Receipt

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CHECKMATE MARINE INC	
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Form 3800, June 2002	See Reverse for Instructions