



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
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TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Defiance County
Koester Metals, Inc
Premise # 03 20 01 0026
**Notice of Violation Close-
out/HPF**

February 8, 2007

Mr. Joe Perkins, Project Engineer
Koester Metals, Inc
1441 Quality Drive
Defiance, Ohio 43512

Dear Mr. Perkins:

The Division of Air Pollution Control (DAPC) has reviewed Koester Metals, Inc's letter dated January 18, 2007, and subsequent letter received on January 31, which contained responses to DAPC's December 20, Notice of Violation (NOV). The NOV was issued for the failure to maintain monthly clean-up solvent usage, and not maintaining the rolling, 12-month records for HAP's and VOCs from coating and clean-up operations. Koester Metals also used coatings that exceeded the 3.5 lbs. VOC/gallon restriction.

The company's response stated that two of the MSDS's referenced during the inspection were just catalyst components and were not applied unmixed. So, based on the mixing ratios for all products, as applied, only one coating, the wash primer, exceeded the 3.5 lbs. VOC/gallon restriction. The use of this primer was discontinued on December 22, and the total usage for the previous six months was less than 5 gallons. Koester Metals is currently evaluating a substitute and will provide our office with the, as applied, data sheet for the new wash primer.

The company's response also included monthly coating and clean-up usage data, along with the corresponding MSDS's. Koester Metals provided the rolling, 12-month totals for each individual HAP, combined HAP's and VOC's from coating and clean-up operations.

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Based on the company's response to the NOV, and documentation provided, we have determined that the compliance plan is acceptable. No further action is being taken at this time for the violations cited in the December 20, 2006 NOV and the violations are considered resolved.

Should you have any questions and/or comments regarding this letter, please feel free to give me a call at (419) 373-3136.

Sincerely,



Jay P. Liebrecht
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC, NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, US EPA-Region V
NWDO Follow-up File

~~DAPC, NWDO File~~