



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Erie County
Automotive Components Holding, LLC.
Premise # 03.22.02.0042
Notice of Violation - HPF

February 8, 2008

Mr. Richard Frasca, Environmental Engineer
Automotive Components Holding, LLC.
3020 Tiffin Avenue
Sandusky, Ohio 44870

Dear Mr. Frasca:

This letter shall serve as follow-up to the inspection conducted on February 6, 2008, of Automotive Components Holding, LLC (ACH), Sandusky, by Ms. E. Jay Murphy and myself. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located at the above referenced facility.

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

1. Regarding emissions unit R051, the facility is in compliance with the Federally Enforceable terms and conditions of the Title V permit, however, there were nine exceedances noted of the State Enforceable emissions limit of 37.5 pounds of organic compounds per hour (lbs OC/hr). The exceedances were noted on the following dates: 7/19/07; 7/20/07; 7/23/07; 8/2/07; 8/30/07; 8/31/07; 9/7/07; 9/21/07, and; 12/17/07.

Per Part III B.1.2.a of the permit, this limitation was based on the unit's potential to emit (PTE). This exceedance is an indicator that the facility has either modified the emissions unit without first obtaining a State of Ohio Permit-to-Install (PTI), which is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A), or the original PTI does not reflect the emissions unit's true PTE. Within 30 days of receipt of this letter ACH must either submit a complete PTI application or provide an explanation for the exceedances.

2. Regarding emissions unit R057, PTI 03-13961 Part III.A.1.1 limits this unit to emissions of 38.25 lbs OC/hr. While reviewing records for R057, one exceedance of this limit was noted on 1/1/07.

Mr. Richard Frasca, Environmental Engineer

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Per Part III.A.V.1.a of the permit, this limitation was based on the unit's PTE. This exceedance is an indicator that the facility has either modified the emissions unit without first obtaining a State of Ohio Permit-to-Install (PTI), which is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A), or the original PTI does not reflect the emissions unit's true PTE. Within 30 days of receipt of this letter ACH must either submit a complete PTI application or provide an explanation for the exceedances.

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.

Thank you for taking the time to accommodate our schedule at the time of our visit. If the company has any questions or concerns regarding this letter, please contact me at the above address, by calling (419) 373-3137 or via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/l/r

pc: Lisa Holscher, US EPA Region 5
Tom Kalman, DAPC/CO
Don Waltermeyer, DAPC/NWDO
Samir Araj, DAPC/NWDO
Tom Sattler, DAPC/NWDO
~~Thomas C. Cikotte, DAPC/NWDO~~