



**Environmental
Protection Agency**

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

Re: Erie County
IAC Huron, LLC
Premise #0322010214
Post-inspection letter
Notice of Violation
HPV – GC2

November 8, 2010

CERTIFIED MAIL

Mr. Sean P. Reedy
Safety, Health and Environmental Manager
International Automotive Components (IAC)
1608 Sawmill Parkway
Huron, Ohio 44839

Dear Mr. Reedy:

This letter shall serve as follow-up to the inspection conducted at IAC – Huron Plant on October 13, 2010. The reason for the inspection was to determine the compliance status of the emission units that are operating at IAC with the rules and regulations of the Division of Air Pollution Control (DAPC). The last documented inspection of this facility was on August 14, 1997.

A partial review of the records onsite as well as a review of the records at the Northwest District Office (NWDO) resulted in the findings summarized below.

1. IAC was issued a Permit to Install (PTI) #03-16207 issued final on August 31, 2004, for a paint booth and drying oven for coating plastic automotive parts. This emissions unit is identified as R007. The records reviewed for this emissions unit did not comply with the recordkeeping requirements in the PTI. The following pieces of information were not available in the records:
 - a. Documentation of whether or not each coating material employed is a photochemically reactive material;
 - b. The organic compound (OC) content, in pounds per gallon, for each coating employed
 - c. The OC emission rate for each coating employed, in pounds per month;
 - d. The total OC emission rate for all coating materials employed; and
 - e. The annual, year to date OC emissions from all coating materials employed for each calendar month from January to December.

IAC is therefore in violation of the recordkeeping requirements stated in term and condition C.1. of the PTI as well as Ohio Revised Code (OAC) section 3704.05 based on the information detailed above.

2. It was unclear whether any cleanup material is used in emissions unit R007. Please clarify this issue.
3. The emission limitations in PTI #03-16207 are based on the potential to emit (PTE) for emission unit R007 which is a maximum coating usage of 3.10 gallons per hour and a maximum OC content of 0.97 pound OC per gallon. In reviewing only seven days of data, the highest coating usage among those days was on August 31, 2010 (69 gallons).
Based on this information, it does not appear that the maximum hourly coatings usage can be complied with.

The coatings employed in this emissions unit exceed the maximum OC content as established by the PTI. For example, one of the coatings has OC content of 4.39 pounds per gallon. This information is based on the Material Safety Data Sheet (MSDS) provided to me during the inspection. IAC is therefore in violation of the emission limitation established in the PTI as well as in violation of ORC section 3704.05.

4. IAC was issued a Permit-to-Install and Operate (PTIO) (#P0105064) issued final on June 24, 2009, for emissions unit R008 (J300 line). The records reviewed during the inspection showed that IAC is in violation of the recordkeeping requirements in the PTIO as well as ORC section 3704.05 for both coating and cleanup material (same issues as raised in #1).
5. The PTE of emissions unit R008 is based upon a maximum coating usage of 1.889 gallons per hour and a maximum OC content of 2.86 pounds per gallon. In reviewing the records of just four days (September 22, 27-29, 2010), it was determined that IAC is in violation of the emission limitations in PTIO #P0105064 as well as ORC section 3704.05. The amount of coating employed during September 28, 2010, was 225 gallons, far in exceedance of the PTE, and therefore a violation of the emission limitations established in the PTIO.

IAC is using similar coatings in emissions unit R008 (J300 line) as in emissions unit R007. One of the coatings used has an OC content of 4.39 pounds per gallon, far in excess of the established potential of 2.86 pounds OC per gallon. Therefore, IAC is in violation of the emission limitations established in the PTIO as well as in violation of ORC section 3704.05.

6. The records that IAC must produce for each emissions unit for the time period spanning from January 1, 2007 to present are:
 - a. Daily usage records of coating(s) employed and cleanup material(s) employed;
 - b. Daily emissions of OC from coating(s) employed and cleanup material(s) employed;
 - c. MSDS of all coatings, cleanup and catalysts employed;
 - d. Maximum coating usage per hour; and

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e. Maximum OC content of coating employed.

In addition, it is imperative that IAC closely review their air permits and start keeping records of their coating operations as required in those permits. If IAC has any questions concerning these permits, please contact Melanie Ray, of our office, at (419) 373-4111.

The information requested above is due by no later than November 29, 2010. Please be advised that the submission of information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

If you have any questions and/or comments about this letter, please feel free to contact me electronically at mohammad.smidi@epa.ohio.gov or by phone at (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/lr

pc: Tom Kalman, DAPC-CO
DAPC-NWDO File >
Certified Mail Receipt Number 7009 1680 0002 4297 3787

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 Huron, OH 44835

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