

Re: Hancock County  
0332010063  
Sanoh America, Inc.  
Stack Test  
**Notice of Violation**

Certified Mail

April 14, 2009

Mr. Jaimin Patel  
Sanoh America, Inc.  
1849 Industrial Drive  
Findlay, OH 45840

Dear Mr. Patel:

The stack test conducted on August 27, 2008 for Ohio EPA emissions units K003 and K004 has been reviewed. The testing was, for the most part, conducted in conformance with Ohio EPA methods and procedures. However, during the test it was observed that the Method 25 gas diluter system being used by the testing company was past its due date for recalibration (July 2, 2008).

Paragraph 2.1.1 of Method 205 requires this diluter be calibrated once per calendar year. Although the Ohio EPA will accept the results of this stack test this time, future deviations from testing procedures may result in tests being rejected. Based on this, our review confirms the following reported data is accurate:

**Critical Test Data - VOC  
(In Three Run Averages)**

Emission Unit	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
K003	0.82 lb/hr as VOC* 98.4 % DRE*	1.78 lbs/hr 95% DRE	44.2 lbs VOC/hr	35.52 lbs VOC/hr
K004	0.82 lb/hr as VOC* 98.4 % DRE*	0.84 lb/hr 95% DRE	10.8 lbs VOC/hr	16.83 lbs VOC/hr

\*Represents the combined emissions from K003 and K004. The hourly rates were calculated assuming the VOC is all n-butyl alcohol. The average RTO temperature during the test was 1504.3°F. Emission Units K003 and K004 are physically united i.e., they share a common control device and stack. They were being operated simultaneously during the test.

Although Ohio EPA is willing to accept this most recent test as a demonstration of compliance, the original stack test attempted on April 16, 2008 was improperly discontinued when outlet VOC concentrations began to increase to approximately 60 ppm and frequently spiked up to 140 ppm. Arbitrarily stopping a test when preliminary results indicate noncompliance is without justification. When we applied the average flow rate of 6,722 DSCFM from the August 2006 stack test report and used a conservative concentration of 60 ppm, the emission rate would equate to 2.76 lbs of VOC/hour. This exceeds the combined allowable emission rate of 2.62 lbs of VOC/hour and is a violation of the terms and conditions of Permit to Install #03-16361 and ORC 3704.05.

The company provided no valid explanation for the stopping the test. If a malfunction of the regenerative thermal oxidizer (RTO) did occur, no malfunction notification was submitted in accordance with the requirements of OAC rule 3745-15-06(B). In addition, we specifically requested that the test data that was generated prior to the test being stopped be submitted for our review. This request was made in the

presence of Sanoh and stack testing company personnel. Not only was this not done, it is our understanding that the testing company subsequently deleted the information. In the absence of any information to the contrary, we consider the duration of the emissions violation to extend from April 16 to August 27, 2008.

In addition to the above violation, emissions unit K003 was being operated at a coating VOC application rate that exceeded its maximum permitted potential, as indicated in its permit application. This is an indication that Sanoh modified the unit without first obtaining a permit modification which is a violation of both OAC rule 3745-31-02 and ORC 3704.05. For Emissions Unit K004, the company must explain why it was only being operated at 64% of its capacity when Ohio EPA requires sources be operated at their maximum capacities during compliance tests.

Sanoh's written response to the violations/issues raised in this letter is requested by May 15, 2009. Please be advised that submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date. Should you have any questions regarding this letter, please feel free to contact me directly at (419) 373-3115.

Sincerely,

Julie L. McCarthy  
Division of Air Pollution Control

pc: Robert Teer, DAPC, NWDO  
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