



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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

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

Re: Huron County
Autoplas
Premise # 0339010151
Notice of Violation -HPF

June 19, 2008

CERTIFIED MAIL

Mr. John Mentis, Plant Manager
Autoplas
560 Goodrich Road
Bellevue, Ohio 44811

Dear Mr. Mentis:

This letter shall serve as a follow-up to the inspection conducted on June 5, 2008, of the above-referenced facility by Jeffrey Skebba and Brian Riedmaier of the Division of Air Pollution Control, Northwest District Office (DAPC/NWDO). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there. Based on discussions and observations during the inspection, and a review of the company's files, our findings are as follows:

1. Permit to install (PTI) #03-13652 requires that cleanup materials containing volatile organic compounds (VOC), as defined in OAC rule 3745-21-01, be prohibited from use in all emission units at the facility. Upon reviewing company records, it was evident that MEK (methyl ethyl ketone) was being employed to clean paint lines and spray guns. MEK is a VOC containing solvent.

The company's use of MEK has resulted in violations of the operational restriction in PTI #03-13652 (Part II.B.2.), as defined in OAC rule 3745-21-01 and ORC 3704.05.

The company should immediately cease using MEK as a cleanup material or obtain a permit modification to remove this restriction. The use of MEK has not resulted in a violation of the synthetic minor emission restriction.

2. The facility is required to maintain a 12-month rolling calculation of facility-wide, individual hazardous air pollutant (HAP) emissions. At the time of the inspection, this was not being recorded. These are violations of OAC rule 3745-31-05(C) in PTI #03-13652 (Part II.A.1.) and ORC 3704.05.

Mr. John Mentis, Plant Manager

June 19, 2008

Page 2

The facility believes that it has this information throughout various databases, but not currently in an easily available format. This information needs to be submitted to the DAPC/NWDO to determine compliance with appropriate limits.

3. The facility has space heaters that are used for building heating. Please provide a list of the heaters that includes the type of fuel and their maximum heat input rates, in million Btu per hour. This information is needed to determine whether each is exempt from permitting.
4. Mr. Skebba mentioned that a new DAPC/NWDO employee is going to be the primary contact for the facility. Her contact information is E. Jay Murphy at (419) 373-3069 or Elizabeth.Murphy@epa.state.oh.us. All reports and questions the company may have (besides responding to this NOV) can be submitted to E Jay.

The DAPC/NWDO is requesting a written response to item Nos. 1 through 3 by no later than July 18, 2008. Please be advised that the submission of information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to Ohio Revised Code Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

The efforts of Terri Cummings, Quality Manager, are appreciated for accommodating our schedule at the time of our visit. Should you have any questions or comments, feel free to contact me at (419) 373-3110 or Brian.Riedmaier@epa.state.oh.us.

Sincerely,



Brian Riedmaier
Environmental Specialist
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, U.S.EPA-Region V
Tom Kalman, DAPC-CO
~~DAPC-NWDO File~~

7006 3450 0001 0667 4759

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Postage	\$ 42
Third Class	2.70
Postage and Fees	2.20
Priority Mail & Fees	\$ 5.32

261

Send To
 JENN MENTIS, PLANT MGR - AUTOPLAS
 560 GOODRICH ROAD
 BELLEVUE, OH 44811

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:
 MR. JENN MENTIS, PLANT MGR
 AUTOPLAS
 560 GOODRICH ROAD
 BELLEVUE, OH 44811

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Cecilia Stricker Agent
 Addressee

B. Received by (Printed Name)
 Cecilia Stricker

C. Date of Delivery
 6/20/08

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7006 3450 0001 0667 4759