



State of Ohio Environmental Protection Agency

Northwest District Office

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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
CVG Acquisition, LLC
Premise # 0339020133
Notice of Violation - HPF

June 17, 2008

CERTIFIED MAIL

Mr. Lee Winer
CVG Acquisition, LLC
55 N. Garfield Street
Norwalk, Ohio 44857

Dear Mr. Winer:

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. No records of monthly coating usage were kept at the site. The facility has a consultant which performs the recordkeeping requirements of its synthetic minor permit to install (PTI) #03-17226. These records were submitted to the OEPA, via e-mail, in the afternoon, on the date of inspection. The facility's failure to keep these records on-site at all times is a violation of the general terms and conditions of permit and ORC 3704.05.
2. The following information, which was provided by the company's consultant, are considered violations of PTI #03-17226 emission limits:

The company is employing coatings in emission units K003 and K016 that appear to exceed the allowable limitation of 3.0 lbs of volatile organic compound (VOC)/gal. These are violations of OAC rule 3745-21-09(U)(1)(i) under Part II.A.1. of the permit and ORC 3704.05.

According to the spreadsheet provided, emission unit K016 was not operated from January 2007 through May 2008, due to the coating usage numbers. At the time of the inspection, this unit was in operation. The DAPC is requesting an explanation if the coating usage in this time period is accurate.

Information is needed regarding the lbs VOC/gal of coating as applied. The spreadsheet does not clearly show which coating materials are being mixed and their respective amounts.

Facility wide cleanup operation, emission unit P801, has the same emissions totals reported for each month from, January 2007 until May 2008. The permit allowable is 501.7 lbs (organic compound) OC/month and the reported value is 959.47 lbs VOC/month. Additionally, the information provided does not state the emissions in lbs OC/month, only lbs VOC/month. These are violations of OAC rule 3745-31-05(A)(3) under Part II.A.1. of the permit and ORC 3704.05.

It appears that the company is not using an accurate method of calculating usages and emissions since the amount used is the same each month. Please revise the entire spreadsheet so that monthly emission totals are correct, and show how the company will comply with the 501.7 lbs OC/month limitation.

The facility is required facility to keep a 12-month rolling calculation of facility-wide, individual hazardous air pollutant (HAP) emissions. The facility appears to be out of compliance since no information was submitted showing the individual HAP emissions. The individual HAP allowable is 9.5 tons per rolling, 12-month period. These are violations of OAC rule 3745-31-05(C) under Part II.A.1. of the permit and ORC 3704.05.

We are requesting that the company provide all individual HAP information so that the DAPC can determine the entire compliance status.

3. The original permit to operate (PTO) application received by the DAPC does not reflect current operations and is required to be resubmitted. Over the past few years and multiple permit modifications, several units have either been combined or shutdown. PTI #03-17226 establishes the emission units K003 (E-coating line and associated curing oven), K016 (Primer repair operation), K017 (Coach joint sealer operation), and P801 (facility wide cleanup).

The original PTO application used different emission unit identification numbers. We are requesting the facility to submit an application that will include the emission unit id's established in PTI #03-17226.

4. Several emission units have been permanently shutdown including units K002 (two coating booths, less than 5 gallons per day), K010 (touch up booth, less than 5 gallons per day), K011 (black cab repair spray booth) and K014 (interior topcoat application), P008 (electric sludge dryer), and P009 (copper buffing booth).

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5. Mr. Skebba mentioned during the inspection that a new DAPC/NWDO employee is going to be the primary contact for this facility. Her contact information is, E. Jay Murphy at (419) 373-3069 or Elizabeth.Murphy@epa.state.oh.us. Any reports or questions you may have can be submitted to E. Jay.

The DAPC is requesting a written response to Numbers 1 and 2 by no later than July 17, 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 Mr. Lee Winer, CVG Acquisition, 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

/llr

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

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MR WALKER - P.V.C. Acquisition, LLC
 55 N GARFIELD STREET
 CLEVELAND, OHIO 44115

PS Form 3800, August 2006 See Reverse for Instructions

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