



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

August 22, 2008

Certified Mail

Mr. Lee Winer
CVG Acquisition, LLC
55 N. Garfield St.
Norwalk, OH 44857

Dear Mr. Winer:

This letter shall serve as a follow-up to your letter of July 11, 2008. Upon further review of PTI #03-17226 and the records provided by you, additional violations have been found. The Division of Air Pollution control, Northwest District Office (DAPC/NWDO) findings are found below.

1. Based on review of coating data submitted with the permit application, the company is employing a coating in emission unit K016 that exceeds the allowable limitation of 3.0 lbs of volatile organic compounds (VOC)/gallon, excluding water and exempt solvents. This continues to be a violation of OAC rule 3745-21-09(U)(1)(i), the terms and conditions of PTI #03-17226 and ORC 3704.05. The company must provide documentation detailing the length of time the facility has been in violation by using this coating.
2. The company has not provided the VOC content of the K016 coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2]. This is a violation of the Monitoring and/or Recordkeeping Requirements section of PTI #03-17226 under Part II.C.1.b. and ORC 3704.05.
3. The company is required to notify the Director in writing of any monthly record showing the use of noncomplying material. The facility has not provided this notification for the

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4. K016 coating referenced above, and is in violation of Part D.2. of PTI #03-17226 and ORC 3704.05.
5. The company has not provided the VOC content of each VOC containing material employed, in pounds per gallon, as applied, for emissions units K003, K016, K017 and P801 combined. This is a violation of the Monitoring and/or Recordkeeping Requirements of PTI #03-17226 under Part II.C.2.c. and ORC 3704.05.
6. The company appears to continue to be in violation of the permitted allowable limit of 501.7 lbs (organic compound) OC/month for emission unit P801 (facility wide cleanup operations). This emission limit is a group limit for all clean-up operations at CVG-Norwalk. Exceeding the permit allowable limit is a violation of OAC rule 3745-31-05(A)(3), the terms and conditions of PTI #03-17226 and ORC 3704.05.

The company is tracking its VOC emissions from Isopropyl Alcohol used for material clean-up in three separate areas on the spreadsheet submitted for Ohio EPA review. Adding these three values together provides the facility wide clean-up emission number, which is limited in PTI #03-17226 to a value of 501.7 lbs OC/month. The spreadsheet shows seven exceedences of this limit in 2007, and three exceedences through June 2008.

7. Please provide a plan for bringing CVG-Norwalk back into compliance with its permit, and a timetable for implementation of the compliance plan.

The violations cited above, and those cited in the Ohio EPA letter dated June 17, 2008 indicate a possible lack of understanding of the CVG-Norwalk permit requirements. It appears that the facility may be misinterpreting both the rules and its permit.

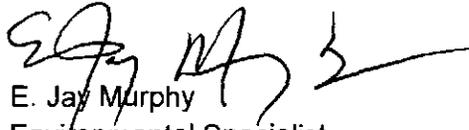
The DAPC is requesting a written response to Nos. 1 through 6 by no later than October 2008.

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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.

Should you have any questions or comments, feel free to contact me at (419) 373-3069 or Elizabeth.Murphy@epa.state.oh.us.

Sincerely,



E. Jay Murphy
Environmental Specialist
Division of Air Pollution Control

/lb

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