



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: Mercer County  
J & M Manufacturing Co., Inc.  
Premise # 03 54 00 0124  
**Notice of Violation**

April 2, 2008

**CERTIFIED MAIL**

Mr. Lou Grieshop, Secretary/Treasurer  
J & M Manufacturing Co., Inc.  
284 Railroad Street  
P.O. Box 547  
Fort Recovery, Ohio 45846

Dear Mr. Grieshop:

This letter shall serve as a follow-up to the inspection that was conducted at your facility on January 31, 2008 by this writer from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). Based on discussions and observations during the inspection, along with the letter from the company consultant on March 10 and recent conversations with the consultant, my findings are as follows:

1. According to the technical data sheet (TDS) for the AAA1045 Primer, the VOC content was 3.81 lbs VOC/gal of coating minus water and exempt solvent. This is a violation of the 3.50 lbs VOC/gal of coating minus water and exempt solvent restriction in the FESOP, OAC rule 3745-21-09(U)(1)(c) and ORC 3704.05. The AAA1045 Primer was applied in Spray Booths 2 and 3, (K011 and K012).

Apparently, the paint supplier made a slight change in the formulation, and sent a revised TDS to reflect the change. As the paint supplier was required to send only low-VOC coatings, J & M was not in the habit of reviewing each TDS that was provided and did not notice the change. The supplier has reformulated the coating below the 3.50 lb VOC/gal restriction and J & M began using this compliant coating.

2. There were no visible emissions (VE) from the stacks serving the coating operations.
3. J & M Manufacturing is fulfilling the monitoring and record keeping requirements specified in the company's FESOP.

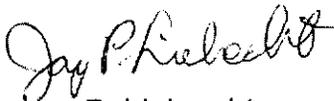
Mr. Lou Grieshop, Secretary/Treasurer  
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Please submit to our office a response to the NOV by May 2, 2008, which includes J & M's action plan to ensure this type of violation does not reoccur. Also include in your response, when the non-compliant coating began to be used, and how much of the coating was used during the time of the violation.

Please be advised that the 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.

Thank you for the courtesy extended during my visit. Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,



Jay P. Liebrecht  
 Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO  
 Sam Araj, DAPC-NWDO  
 Tom Kalman, DAPC, CO  
 Lisa Holscher, US EPA-Region V  
 DAPC-NWDO File

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<p>1. Article Addressed to:</p> <p>MA LUBRICANTS, INC.          J.M. Mfg. Co. Inc.          28 S. LAKE ST.          P.O. BOX 547          FORT KNOX, OH          45846</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
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