



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Putnam County
Clymer Acquisitions, Inc.
407 East Washington Street
Pandora, OH 45877
Premise #0369000045
Notice of Violation

Certified Mail

February 8, 2007

Mr. Greg Christy
General Manager
Kingway Inca
407 East Washington Street
P.O. Box 266
Pandora, Ohio 45877

Dear Mr. Christy:

This letter shall serve as a follow-up to the full compliance evaluation conducted by the Northwest District Office (NWDO) Division of Air Pollution Control (DAPC) of the referenced facility on January 19, 2007. The purpose of the inspection was to determine the compliance status of the facility in relation to the rules and regulations of DAPC.

Based on discussions with you, my observations during the inspection, and the company files located at NWDO, the findings can be summarized as follows:

1. The facility was issued a Permit to Install (PTI) #03-16176 final on June 22, 2006. This PTI resolved the previous outstanding issues with DAPC and permitted the metal furniture coating line consisting of 2 spray booths and an oven (identified as emission unit K001) and the metal parts/metal furniture coating operation (identified as emission unit K002).
2. The facility is required to submit quarterly deviation reports identified on pages 11 and 19 of PTI #03-16176. Since the permit was issued final on June 22, 2006, the facility would have been required to submit a quarterly deviation report for the second quarter by July 31st that covers the period between June 22nd through June 30th. The third quarter report would have been required by October

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31, 2006. The facility is in violation of the reporting requirements of PTI #03-16176 and the Ohio Revised Code (ORC) §3704.05 for not having submitted quarterly deviation reports for the second or third quarter.

3. The facility submitted a letter dated November 15, 2006 to the attention of Mr. Don Waltermeyer. This letter served the purpose of notifying DAPC that the facility was inadvertently sent one drum of orange paint with a volatile organic compound (VOC) content of 3.052 pounds per gallon, as received. The facility is limited to using no more than 3 pounds of VOC per gallon of coating, excluding water and exempt solvents, on an "as applied" basis based on Ohio Administrative Code (OAC) rule 3745-21-09(I) as stated in the permit.

The paint supplier was contacted regarding this matter. It was learned from that conversation that the facility has been supplied that same coating VOC content since October 12, 2005. Therefore, the facility has been in violation of OAC rule 3745-21-09(I) and Ohio Revised Code (ORC) Section 3704.05 since the permit issuance and until the coating was reformulated (January 11, 2007).

4. The facility submitted a fourth quarter deviation report to Mr. Jay Liebrecht dated January 23, 2007 as recommended during the inspection. The report notes that the facility did not have any deviations during the fourth quarter of 2006. However, as indicated in #3 above, the facility continued to have deviations of OAC rule 3745-21-09(I) even after the fourth quarter of 2006. Therefore, the facility is in violation of ORC rule 3704.05(H)(1) for having submitted a false report.
5. As was indicated to you during the post-inspection meeting, the facility needs to provide additional information regarding the type of welding operations that are taking place. You may review US EPA's AP-42 chapter titled "Electric Arc Welding" that can be found at <http://www.epa.gov/ttn/chief/ap42/ch12/final/c12s19.pdf> and identify the electrode type(s) used. The welding operations are air contaminant sources and the facility is in violation of OAC rule 3745-15-05 if it is claiming no permits are necessary due to de minimis emission levels since no calculations were done. Based on that information, emission calculations would need to be performed and submitted.
6. The facility submitted an e-mail dated February 2, 2007 to my attention. The e-mail contained the facility's 2006 usage of paints and solvents. The facility employed a solvent blend in both K001 and K002 that exceeded 4,000 gallons in 2006. The solvent blend has a VOC content of 7.332 pounds of VOC per gallon. Please submit a detailed explanation on how this solvent blend is utilized in these two coating lines.

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Please submit all of the requested information by no later than March 9, 2007 to my attention. Also, please be advised that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions regarding this letter, you may contact me either by e-mail or by telephone at (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist
DAPC, NWDO

/lb

pc: Don Waltermeyer, DAPC, NWDO
Gary Pasheilich, Ohio AGO
Jay Liebrecht, DAPC, NWDO
Jim Orlemann, DAPC, CO
Lisa Holscher, US EPA Region 5
Mohammad Smidi, DAPC, NWDO
Samir Araj, DAPC, NWDO
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