



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Rd.  
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  
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April 23, 2009

**CERTIFIED MAIL**

Ms. Ichaya Dhungel, EHS Manager  
Eaton Inoac Company  
1410 Motor Drive  
Fremont, Ohio 43420

**Subject: Notice of Violation and follow-up to inspection of Eaton Inoac Company  
(0372030199)**

Dear Ms. Dhungel:

This letter shall serve as follow-up to the inspection conducted on April 8, 2009, of the above-referenced facility by Brian Riedmaier and this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, observations during the inspection, and a review of the company's files, our findings are as follows

1. Permit to Install (PTI) 03-13836, issued 3/7/06, requires annual reports to be submitted identifying the total particulate emissions (in tons) for emissions units K004 and K005. These reports are due by January 31 and are to cover the previous calendar year. Reports for 2007 were not submitted for these emissions units in violation of the terms and conditions of the permit and ORC 3704.05. In order to resolve this violation, the company must submit these reports no later than May 7, 2009.
2. Eaton Inoac Company (Eaton) was issued a Title V permit on January 21, 2004. A renewal application was submitted in PDF format via email on August 15, 2008, prior to the permit's February 11, 2009, expiration. The application was required to be submitted via Air Services, at this time, however, issues in Air Services made the application difficult to prepare. The company was allowed to submit in another format by the due date, in order to maintain its "application shield" as long as the application was submitted as soon as possible, in Air Services. The renewal application was finally submitted in Air Services on February 20, 2009. Until the renewal application is processed, Eaton Inoac is required by rule to continue operating under the expired Title V permit.

Ms. Ichaya Dhungel, EHS Manager  
April 23, 2009  
Page 2

The General Terms and Conditions of the facility's Title V permit requires that semi-annual reports for all emissions units be submitted, identifying any deviations from monitoring, recordkeeping or reporting requirements. A review of the facility's file show that semi-annual reports were not submitted for all of 2007 or first half of 2008. Failure to submit the required reports is a violation of the Title V permit and ORC 3704.05. These reports should also be submitted by May 7, 2009, in order to resolve this violation.

3. Upon review of the company's records for facility-wide cleanup (P801), it does not appear that the records are being kept properly. The spreadsheet provided does not show that monthly usage is being tracked and is showing negative inventory for most months. In order to calculate monthly OC emissions, usage must be determined by the following equation:

BI = beginning inventory

EI = ending inventory

P = purchases

A = additions (reclaimed material returned to the facility for use)

R = reclaim (same as A)

$$\text{Usage} = \text{BI} - \text{EI} + \text{P\&A} - \text{R}$$

Please revise the current spreadsheet to show monthly usage and OC emissions, in tons, on a monthly and rolling 12-month period, and submit a copy for our review by May 7, 2009.

4. The facility is subject to the surface coating of plastic parts MACT, 40 CFR, Part 63, Subpart PPPP. The MACT requires semi-annual compliance reports per section 63.4520 for each affected source. The first report required after the initial compliance report was due July 31, 2008, and was to cover the time period from May 1, 2008, through June 30, 2008. Subsequent reports should cover the semiannual reporting period from January 1 through June 30 or the reporting period from July 1 through December 31. To date, the company is in violation of these requirements and has not submitted the first semiannual report due on July 31, 2008, or the report covering the second half of 2008 and due by January 31, 2009.

The company is also required to maintain records for the MACT in accordance with section 63.4530. These records were not readily available for review at the time of the inspection; however, we were told they could be printed out if we needed to see them.

Ms. Ichaya Dhungel, EHS Manager  
April 23, 2009  
Page 3

Unfortunately, we got sidetracked on another issue and these records were never reviewed. Please submit these records from April 2007, to date along with the company's evaluation of its compliance with the MACT requirements by May 7, 2009.

5. Based on our discussions, emissions unit P021 (paint blending operations) has not been used since June or July 2008, and the company has no plans to start blending paints onsite again. Eaton will need to update its facility profile in Air Services to show this emissions unit as shut down. Additionally, insignificant emissions units Z007, Z008, Z014 and Z023 have also been shut down and need updated appropriately in Air Services. Insignificant emissions unit Z045 (blow mold NG material dryer) has also been removed and replaced with an electric dryer. Therefore, Z045 will also need to be shut down and the new electric dryer added.
6. Permit to Install 03-4102 was issued on February 8, 1989, for emissions unit R001 (body side molding paint spray booth) and established organic compound limitations of 8 pounds per hour and 40 pounds per day. A letter was then received on November 5, 1992, saying this emissions unit was no longer being used for production painting but instead for testing, color match mixing and robot programming and that the existing hourly limit was fine.

The company's original Title V application classified this emissions unit as insignificant and the emissions unit was put into the Title V permit as such. However, the PTI was never revoked and calculations could not be located showing this is truly now an insignificant source. Please provide calculations showing the potential to emit for this emissions unit so this office can determine if a permit modification is necessary, or if the PTI can be revoked, if this is now a De Minimis source per OAC rule 3745-15-05.

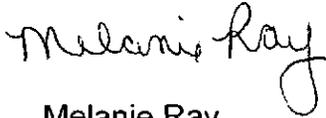
All other emissions units appear to be in compliance with the air pollution control emission limitations and regulations of Ohio EPA at this time.

Please note that 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 such penalties regarding this matter at a later date.

Ms. Ichaya Dhungei, EHS Manager  
April 23, 2009  
Page 4

Thank you for the courtesy extended during our visit. Please submit all the above requested information no later than **May 7, 2009**. If the company has any questions or comments concerning this letter, please feel free to contact me at (419) 373-4111 or email [melanie.ray@epa.state.oh.us](mailto:melanie.ray@epa.state.oh.us).

Sincerely,



Melanie Ray  
Division of Air Pollution Control

//lr

pc: Samir Araj, DAPC-NWDO  
Don Waltermeyer, DAPC-NWDO  
Tom Kalman, DAPC, CO  
Lisa Holscher, USEPA, Region 5, Air and Radiation Division  
DAPC-NWDO Inspection File (Sandusky County) ↵

ec: Brian Riedmaier  
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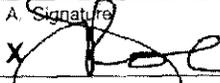
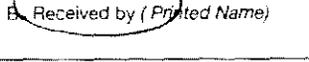
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PS Form 3811, February 2004 See Reverse for Instructions

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