



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

June 24, 2009

**CERTIFIED MAIL**

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

**Subject:** Resolution to Notice of Violation (NOV) issued to Eaton Inoac Company (0372030199) on April 23, 2009, based on the April 8, 2009, facility inspection.

Dear Ms. Dhungel:

This letter shall serve to resolve the NOV issued to the above referenced facility on April 23, 2009. The NOV identified multiple violations discovered during the April 8, 2009, facility inspection. Eaton Inoac Company (EIC) submitted a response to the NOV on May 27, 2009, that sufficiently addressed all issues outlined in the NOV. The following identifies how the company addressed/resolved each issue:

1. An annual particulate emissions report for 2007 for emissions units K004 and K005 was submitted both hard copy and electronically via eBusiness Center on May 27, 2009.
2. Semi-annual reports were submitted both hard copy and electronically for all of 2007 and for the first half of 2008 to comply with the General Terms and Conditions of the facility's Title V permit.
3. At the time of the inspection EIC was not keeping proper records for facility clean-up (P801). The April NOV outlined what information EIC should be collecting on a monthly basis and explained how to calculate the OC emissions. Upon further review, EIC determined that they had not been maintaining records of acetone inventory since May 2008. Without this information, OC emissions could not be accurately calculated to determine compliance with permitted emissions limitation during that time frame. However, the company did use historical inventory data to estimate emissions for the period from May 2008, through April 2009. Based on these estimations, emissions were within permitted limits during this time frame.

Effective April 9, 2009, EIC immediately resumed tracking beginning and ending inventories of clean-up solvents on a monthly basis. The company also noted the failure to keep proper records as a deviation in all quarterly/semi-annual reports covering this time frame.

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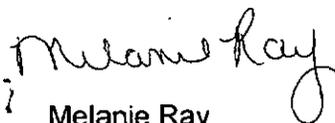
4. All missing MACT, Subpart PPPP semi-annual compliance reports were submitted both hard copy and electronically on May 27, 2009. Additionally, EIC submitted a spreadsheet of the required MACT recordkeeping that was not reviewed at the time of the inspection. A review of the records showed that the company is maintaining appropriate records and appears to be in compliance with the MACT at this time.
5. EIC updated its facility profile in Air Services to shut down emissions units Z007, Z008, Z023 and Z045 and submitted a letter signed by the responsible official notifying this office of these changes. It is the company's intentions to keep Z014, and P021 as active sources at this time.
6. As requested, potential to emit calculations for R001 were submitted via e-mail on 5/8/09 and also by hard copy on May 27, 2009. Based on the calculations provided, it was determined that a modification was not necessary to PTI 03-4102, issued February 8, 1989 at this time and the emissions unit was included as a non-insignificant source in the draft Title V renewal.

At this time, EIC has resolved all issues identified during the April 2009 facility inspection and no further information is required.

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 or pursue or decline such penalties regarding this matter at a later date.

Thank you for the prompt and thorough actions taken to resolve these issues. 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

/llr

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