



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Sandusky County
Eaton Inoac, Company
Premise #0372030199
**Warning Letter
Inspection**

March 2, 2007

Mr. Tim Richards
Eaton Inoac Company
1410 Motor Drive
Fremont, Ohio 43420

Dear Mr. Richards:

This letter shall serve as follow-up to the inspection conducted on February 28, 2007, of the above-referenced facility by this writer and Melanie Ray. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. K005 (Paint Engineering Lab) and P021 (Paint Blending Operation): Permit to Install (PTI) #03-13836 requires the company to maintain daily records of the tons of VOC per rolling, 365-day period. While the company is maintaining daily records of VOC emissions, the rolling, 365-day period records are not being maintained. The company needs to immediately start keeping these records. It should be noted that no violations of the rolling, 365-day VOC limitation were found. The company needs to submit a letter indicating the date that they began keeping these records.
2. K004 (Paint Line #4), K005 (Paint Engineering Lab), K006 (Paint Line #3), P021 (Paint Blending Operation) and P801 (Facility Wide Cleanup Operations): PTI #03-13836 (issued 3/7/06), PTI #03-16194 (issued 12/22/05) and PTI #03-17033 (12/22/05) have a requirement that the company develop an information management system for these units that is capable of generating required records.

This system is required to be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation. To date, the company has implemented this system, but has not submitted information on this system to Ohio EPA for review and approval. The company needs to provide the required information for review and approval.

3. The company submitted an application on June 12, 2006 for a minor modification to their Title V permit. In order to process this application, the company needs to provide all information required in accordance with Ohio Administrative Code (OAC) rule 3745-77-07(C)(1).

The company needs to submit a response to this letter addressing the above referenced issues. This response needs to be submitted by **March 15, 2007**.

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

Thank you for the courtesy extended during my visit. If the company has any questions and/or comments concerning this letter, please contact me at the above address or call (419) 373-3129.

Sincerely,



Andrea L. Chapman
Division of Air Pollution Control

/llr

pc: Samir Araj, Ohio EPA, DAPC-NWDO
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