



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.ohio.gov

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

March 23, 2010

Mr. Gary Jaeger, Environmental Engineering
Whirlpool Corporation - Clyde Division
119 Birdseye Street
Clyde, Ohio 43410

Subject: Resolution to warning letter issued to Whirlpool Corporation – Clyde Division (0372020143) on February 18, 2010 based on January 27, 2010, facility inspection.

Dear Mr. Jaeger:

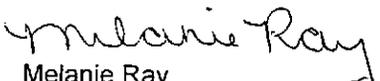
This letter shall serve to resolve the warning issued to Whirlpool Corporation – Clyde Division (Whirlpool) on February 18, 2010. During the inspection, the company was not able to produce sufficient records for emissions units K016 and K012, as required per the company's Title V operating permit, which became effective on January 26, 2010. Partial records were made available at the time of the visit and the company indicated that the missing information could easily be retrieved. Therefore, it was asked that Whirlpool submit all the appropriate records for both emission units by February 22, 2010.

A response was received from the company on February 18, 2010 and included updated spreadsheets for K016 and K012. As requested, monthly records for K012 were submitted for 2008 and 2009 and contained all the required information. Monthly records from June 2009 to present were also submitted for K016. The spreadsheets for K016 show that the company is maintaining all the required data and that the emissions unit is in compliance with the applicable emissions limitations, however, the permit also requires the company to track the total VOC emissions for all coating each month (in tons) and the annual year-to-date VOC emissions for all coatings (in tons). This information will need to be added to the spreadsheet so that compliance can be easily shown during any future site visits.

Whirlpool is also required to submit an annual report which summarizes total VOC emissions from K016. This information was not included in the company's compliance report submitted on January 20, 2010. A revised report was submitted via Air Services on January 27, 2010, to fulfill this requirement. The company has addressed the violations outlined in the warning letter and no additional action is required at this time. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions and/or comments regarding this letter, please feel free to contact me at (419) 373-4111 or by e-mail at melanie.ray@epa.state.oh.us.

Sincerely,


Melanie Ray
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, NWDO, DAPC
NWDO Correspondence File

