



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 Korleski, Director

February 8, 2010

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

Subject: Warning and follow-up letter to January 27, 2010 facility inspection of Whirlpool Corporation-Clyde Division (0372020143) with response due by February 22, 2010.

Dear Mr. Jaeger:

This warning letter shall serve as follow-up to the inspection conducted on January 27, 2010, of the above-referenced facility by 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, my findings are as follows:

1. Permit to Install (PTI) P0104267 for emissions unit K016 was issued on June 17, 2009 and requires the company to maintain monthly coating records [see section d)(1) of the permit]. These records are not being kept by the company in accordance with the requirements of the permit. Specifically, the company is not maintaining records of the VOC contents of the coatings and emissions of VOC for coatings individually and accumulatively. The requirements are also identified in the company's renewal Title V permit which was issued on January 5, 2010 and became effective on January 26, 2010.

Whirlpool must immediately begin maintaining these records. In addition, this office would like for the company to go back to the date of the issuance of the PTI and record the appropriate information from that date to present and submit this information to the Northwest District Office (NWDO) no later than February 22, 2010.

2. PTI P0104267 also requires an annual report be submitted which summarizes the total actual VOC emissions from coating usage for K016. The annual emissions from K016 were not included in the company's 2009 VOC emissions report submitted via Air Services on January 20, 2010.

Mr. Gary Jaeger, Environmental Engineering
February 8, 2010
Page 2

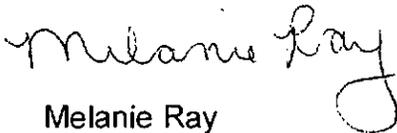
This issue was discussed with the company during the inspection and a revised, acceptable report was promptly resubmitted on January 27, 2010.

3. Emissions units K010, K012, K014 and K015 are subject to OAC rule 3745-17-11(C) and have operational restrictions and reporting requirements associated with the rule. These requirements are outlined in the Title V renewal permit. Whirlpool will need to ensure that the operational restrictions are being followed and to include any necessary information in its quarterly deviations reports beginning with the 1st quarter 2010 report due April 30, 2010.
4. The company is required to maintain monthly records for emissions unit K012 identifying each coating employed and the VOC content, excluding water and exempt solvents, in lbs/gal, of each coating employed. This information was not readily available at the time of the inspection. Whirlpool must immediately begin tracking this information on a monthly basis. In addition, the company should compile this data from the time of the last inspection (May 2008) to present and submit this information to the NWDO no later than February 22, 2010.

All other 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) 373-4111.

Sincerely,



Melanie Ray
Division of Air Pollution Control

/l/r

pc: Samir Araj, NWDO, DAPC
Don Waltermeyer, NWDO, DAPC
DAPC-NWDO Sandusky County File