



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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
Chris Korleski, Director

Re: Seneca County
InterMetro Industries Corporation
1150 State Street
Fostoria, OH 44830
Premise #0374010197
Notice of Violation

Certified Mail

August 1, 2007

Mr. Mike Frankenfield
QA Supervisor
InterMetro Industries Corporation
1150 State Street
Fostoria, OH 44830

Dear Mr. Frankenfield:

This letter shall serve as follow-up to the inspection conducted at the above-referenced facility on July 16, 2007. The reason for the inspection was to determine the compliance status of the emission units that are operating at your facility. The inspection was conducted by Mr. Thomas Cikotte and myself from the Northwest District Office (NWDO) Division of Air Pollution Control (DAPC).

Based on the discussions with you, the observations during the inspection, and a review of the company records, the findings of the inspection are as follows:

1. The facility has two pultrusion units that are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 63 Subpart WWWW. The compliance date for this Subpart was on April 21, 2006. The facility is required to do the following at this time:
 - identify which option the facility chose to meet the standards (per §63.5380)
 - submit Hazardous Air Pollutant (HAP) emission calculations of before and after the steps taken to reduce HAP emissions.
 - MSDS of all cleaning solvents

Mr. Mike Frankenfield
August 3, 2007
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- submit an initial notification of compliance status as required by §63.5905 and §63.9 that was due on May 20, 2006. NWDO records indicate that the facility failed to submit this report and is therefore in violation of the stated rules.
 - submit a semi-annual compliance report as required by §63.5910 and §63.10 that was due on January 31, 2007. NWDO records indicate that the facility failed to submit this report and is therefore in violation of the stated rules.
 - submit a second semi-annual compliance report as required by §63.5910 and §63.10 that is due on July 31, 2007 (as explained in an e-mail on July 27, 2007).
2. The facility submitted a letter dated July 6, 2007 from Mr. Thomas Rash to the attention of Mrs. Andrea Odendahl. This letter noted that the facility is subject to Subpart WWWW. It is uncertain whether Mr. Rash can be defined as a Responsible Official. You may view the definition at http://www.epa.state.oh.us/dapc/title_v/respoff.pdf and submit justification that Mr. Rash would be considered the Responsible Official or have the document signed by a Responsible Official.
 3. The facility is required to submit detailed information regarding the constituents of each batch and supply the representative MSDS of each.

Please be advised that the 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 to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns, please contact me at (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC/NWDO
Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC/CO
~~DAPC/NWDO-File:~~
7005 1160 0002 4566 0023

ec: Andrea Odendahl, DAPC/NWDO
Mike Frankenfield, InterMetro Industries
Mohammad Smidi, DAPC/NWDO
Thomas Cikotte, DAPC/NWDO

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1. Article Addressed to:

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