



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Premise #0374010197
Inspection letter
Notice of Violation
(NOV/non-HPV)

January 27, 2011

Mr. Mike Frankenfield, Production Supervisor
InterMetro Industries Corporation
1150 State Street
Fostoria, Ohio 44830

Dear Mr. Frankenfield:

This letter shall serve as follow-up to the inspection conducted at the above-referenced facility on December 20, 2010. The reason for the inspection was to determine the compliance status of the emission units that are operating at InterMetro Industries Corporation (herein referred to as IIC) with the rules and regulation of the Division of Air Pollution Control (DAPC).

Based on the discussions with you, my observations during the inspection, and a review of the company records at the Northwest District Office (NWDO), the findings of the inspection are summarized as follows:

1. IIC used a lacquer thinner until July 2010, as a clean-up solvent to clean parts from the pultrusion units (emission units P001 and P002). The Material Safety Data Sheet for this thinner was provided, in e-mail communication, after the inspection. The thinner contains toluene at 50% by weight percent thereby making it a photochemically reactive material (PRM) as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C)(5). Both the Permit to Install (PTI) and the Title V permit restrict IIC to use clean-up solvents that are not PRM. Based on that restriction and IIC usage of a lacquer thinner that was a PRM, IIC is found in violation of the PTI and Title V permits in this regard. The duration of this violation ended in July 2010.
2. The materials that have replaced the lacquer thinner are two SURFASOLVE products. The manufacturer of these clean-up solvents, 21st Composites, Inc., has submitted information detailing that the solvent used at IIC is not a PRM.
3. The Facility Profile in eBusiness Center will require updating and submittal. The emission units that have been permanently shut down will need to be reflected in the profile.

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At this time, IIC has ceased using a PRM cleanup material on P001 and P002 and it is using compliant cleanup solvents in its place. The action taken by IIC has corrected the violation and the emissions units are now being operated in compliance with the permit requirements. Please be advised that the submission of information to respond to this letter does not constitute a waiver of 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.

Ohio EPA requests that IIC submit a revised 2009 Title V Annual Compliance Certification (TV ACC) identifying the PRM non-compliance issue no later than February 15, 2011. The 2010 TV ACC will also need to indicate this violation.

Thank you for accommodating time in your schedule for the inspection. If you have any questions and/or concerns, please contact me at (419) 373-3118 or by e-mail at mohammad.smidi@epa.ohio.gov.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

pc: DAPC-NWDO Facility File ;
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