



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

July 28, 2010

**CERTIFIED MAIL**

Mr. Paul Witte, Manufacturing Engineering Manager  
ITW Tomco  
730 East South Street  
Bryan, Ohio 43506

Re: Notice of Violation (NOV) based on receipt of information requested in summary of inspection letter dated June 9, 2010, for inspection conducted on May 11, 2010, at ITW Tomco (0386010099) with response due by August 31, 2010.

Dear Mr. Witte:

This letter shall serve as a follow-up to the information received in the company's letter dated June 21, 2010, as requested in the inspection letter dated June 9, 2010. Based on the information provided, the company is being issued a Notice of Violation (NOV) for the following issues:

Emissions unit K001 (Adhesive Dip Tank – Metal Automotive Parts): This emissions unit is permitted under Permit to Install (PTI) #03-17383 issued on 01/15/08 and Permit to Operate (PTO) issued on 02/12/08. In reviewing the company records it has been determined that, the company tracks two components of coating usage, 1) actual coating usage and 2) solvent adds (methanol and chemlok being added to that tank in a one to one ratio to compensate for evaporative loss). Currently, the company only uses the actual coating usage numbers to determine compliance with the permit limit of 63.7 lbs OC/day and coating usage restriction of no more than 10 gallons per day. Emissions from the solvent adds component of coating usage are not accounted for in the company's emissions calculations, nor are they accounted for in the permit.

Based on the company's records of actual coating usage, it has been determined that the company has violated Ohio Administrative Code (OAC) rule 3745-21-09(U)(2)(e)(iii) by exceeding the 10 gallons per day restriction. In addition, the company has violated OAC rule 3745-31-05(A)(3) by exceeding the 63.7 lbs of OC/day emission limitation. These violations occurred on days with greater than 10 gallons of coating usage, and on days that tank adds alone, or in conjunction with coating usage, resulted in an exceedance of the 10 gallons. This determination is based on the fact that the coating's VOC content and the emission limit directly correlate, through a mass balance calculation, to the 10 gallons of coating usage per day limit established in the permit.

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For example, on July 14, 2008, OC emission calculations are as follows:

### **Solvent Addition Emissions**

(3.5 gal chemlok/day) (6.13 lbs OC/gal solvent) = 21.46 lbs OC/day from solvent additions

(3.5 gal methanol/day) (6.61 lbs OC/gal solvent) = 23.14 lbs OC/day from solvent additions

### **Coating Usage Emissions**

(6.37 lbs OC/gal coating) (6 gal coating applied/day) = 38.22 lbs OC/day from coating usage

### **Total OC emissions from solvent additions and coating usage**

21.46 lbs OC/day + 23.14 lbs OC/day + 38.22 lbs OC/day = 82.82 lbs OC/day

In order to resolve the violations referenced above and to address the existing permitting issues, the company is required to submit an administrative modification to the PTI through Ohio EPA's eBusiness Center. Included in the application should be, at a minimum, information on coating usage, solvent adds, coating usage emissions calculations, solvent add emission calculations, and total coating and solvent add emissions.

In addition, the company is required to submit Emissions Activity Form (EAC) 3103. Ohio EPA requests coating usage information be included in Table 1: "Coating Type and Usage Data" of the form. All solvent adds made to the tank should be incorporated into the table associated with information request #13 on the above mentioned form. Although this table is used to obtain cleanup material data associated with the operation, Ohio EPA is requesting the company tailor the table to incorporate the information necessary to determine daily emissions and usage of solvent add materials. Please provide the usage in gallons per day and gallons per year for each solvent add made to the tank (i.e. if multiple solvents or solvent combinations are added to the tank, include each in the table along with the solvent density, daily gallon usage, and annual gallon usage for each solvent, or solvent combination. If the materials are added as a solvent combination, please provide the solvent density of the combination as it is added to the tank).

Finally, Ohio EPA requests that ITW Tomco submit the information referenced above by August 31, 2010. If the information cannot be submitted by August 31, 2010, a letter stating when the information will be available should be submitted in lieu of the requested information, outlining when the requested data will be submitted.

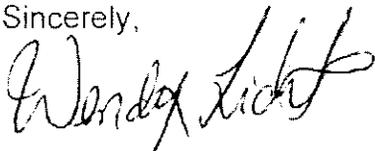
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If Ohio EPA does not receive the requested information or the above mentioned letter by said date, ITW Tomco will continue to be in violation of the aforementioned requirements of the Ohio Administrative Code and further penalties may be pursued.

Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3134 or electronically at [wendy.licht@epa.state.oh.us](mailto:wendy.licht@epa.state.oh.us). If you have any questions concerning the PTIO application process please contact Julie Budge at 419-373-3132 or electronically at [Julie.budge@epa.state.oh.us](mailto:Julie.budge@epa.state.oh.us).

Sincerely,



Wendy Licht  
Division of Air Pollution Control

//lr

pc: Mark Budge, NWDO, DAPC  
Tom Kalman, CO, DAPC  
Lisa Holscher, US EPA  
DAPC-NWDO File  
Certified Receipt Number 7009 1680 0002 4297 1684

ec: Wendy Licht, NWDO, DAPC

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<b>Total</b>	<b>\$ 324</b>

ITW Tomco  
419 South Street  
63563

PS Form 3800, August 2008 See Reverse for Instructions