



State of Ohio Environmental Protection Agency

**Northwest District Office**

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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 Korfeski, Director

Re: Williams County  
Plastech (Bryan facility – nka JCIM)  
03 86 01 0201  
**Notice of Violation**

September 9, 2008

**CERTIFIED MAIL**  
**7002 2410 0003 1155 8836**

Mr. Pat Kresnak  
Director, Environmental Health & Safety  
JCIM  
1600 Harmon Rd.  
Auburn Hills, Michigan 48326

Dear Mr. Kresnak:

This letter shall serve as follow-up to the facility inspection conducted on July 22, 2008, of the above referenced facility, by myself and Brian Riedmaier, with yourself, Bruce Stephens, and Barry Brown. The purpose of this inspection was to determine the compliance status of all air contaminant sources located there.

Based on our discussions, our observations during the inspection, and a review of the company's files, our findings are as follows:

1. The facility was issued Permit to Install (PTI) 03-17277 on April 12, 2007 to implement voluntary 'synthetic minor' emissions limits for Hazardous Air Pollutants (HAPs). The emissions rates of HAPs in the PTI are required to be tracked through 'material balance' tracking, recording, and calculation of the coating usages and their HAP contents, as stipulated in the PTI.

At the inspection, the company was able to produce records of usages of the various coatings for the various emissions units, and VOC emissions figures. However, the necessary HAP records and calculations could not be produced. This is in violation of the PTI and ORC 3704.05.

The company was able to produce MSDS's for almost all of the coatings, and most of these sheets had HAP information that, together with the coating usage data, was indicative of HAP totals for the facility which would be in compliance with the rolling annual limits in the PTI, but this information was by no means conclusive.

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2. As of the time of this inspection and this letter, our records show that the company's annual Title V permit Compliance Certification has not been submitted for calendar year 2007. This was due on April 30, 2008, and failure to submit it is a violation of the company's Title V permit and ORC 3704.05. Although a VOC synthetic minor permit is currently being processed for the facility, the company is still subject to the requirements of its Title V permit until such time that the VOC synthetic minor permit is issued.

The company is required to correct the violations in items 1 and 2. Accurate records and calculations of HAP emissions are required for the facility, from the effective date of the PTI of April 12, 2007 to present, as well as a 2007 Compliance Certification report.

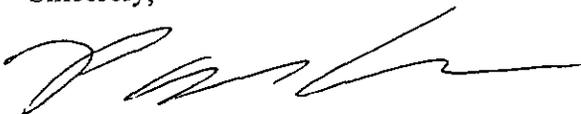
All other air contaminant sources at this location appear to be in compliance with applicable air emissions limitations at this time. Please submit a response as discussed above by October 3, 2008.

Please be advised that the submission of information to respond to this letter does not constitute waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC 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.

Should the company have any questions and/or comments, I may be reached at (419) 373-3117. I may also be contacted electronically by E-mail at: [paul.chad@epa.state.oh.us](mailto:paul.chad@epa.state.oh.us)

Enclosed please find a copy of the letter we sent you on August 13, 2008, which was sent Certified Mail, but is unknown if it was received.

Sincerely,



Paul Chad  
Division of Air Pollution Control

/csl

Enclosure: Letter dated August 13, 2008  
pc: Sam Araj, DAPC NWDO  
Don Waltermeyer, DAPC NWDO  
Tom Kalman, DAPC CO  
Lisa Holscher, US EPA - Region V  
DAPC NWDO File  
Follow-up File

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