



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Williams County
JCIM-Bryan (Johnson Controls)
03 86 01 0201
Return to Compliance

November 25, 2008

Mr. Michael L. Stoelton
Environmental Executive
Johnson Controls Automotive Experience
49200 Halyard Dr.
Plymouth, MI 48170

Dear Mr. Stoelton:

The Division of Air Pollution Control (DAPC) has reviewed the company's letter with attachments dated October 20, 2008, which contained responses to DAPC's September 9, Notice of Violation (NOV). This NOV was for failure to keep records of Hazardous Air Pollutant (HAP) constituents used in coatings, and for failure to submit a timely Title V Compliance Certification for calendar year 2007.

The company has implemented a recordkeeping system for HAPs, and has retroactively calculated HAP usage and emissions estimates back to January 2006. The records confirm that no 'synthetic minor' HAP emission limitations have been exceeded. The company has also submitted an acceptable Compliance Certification report for 2007. As the company has correctly noted, the late submission of this report should be cited as noncompliance for calendar year 2008, in the next report due April 30, 2009.

Based on the company's response to the NOV, we have determined that the compliance plan is acceptable. The actions taken have corrected the violations and these emission units are now being operated in compliance with the permit requirements. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

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

Sincerely,

Paul Chad
Division of Air Pollution Control
/csl

pc: Don Waltermeyer, DAPC, NWDO
Tom Kalman, DAPC, CO

Lisa Holscher, US EPA-Region V
;DAPC, NWDO File;