



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Wood County
Bulk Molding Compounds, Inc. (BMCI)
12600 Eckel Road
Perrysburg, OH 43551
Premise #0387040001
Inspection Letter
Notice of Violation

March 30, 2010

~~Certified Mail~~

Ms. Christine Bills
Plant Manager
BMCI
12600 Eckel Road
Perrysburg, Ohio 43551

Dear Ms. Bills:

This letter shall serve as the follow-up to the inspection conducted on March 11, 2010, at the above referenced facility by Ms. Carol Norman and myself as representatives of the Division of Air Pollution Control (DAPC). The purpose of the inspection was to determine the compliance status of all air contaminant sources located at this facility.

The findings of this inspection can be summarized as follows based on discussions with you, the observations during the inspection, and a review of the company files at the Northwest District Office (NWDO):

1. BMCI was issued a renewal Title V permit on November 17, 2008. This permit was modified twice with the latest modification being issued on September 22, 2009. One of the requirements in the permit that has not been met is the submission of an annual report that summarizes the total actual OC emissions from mixing operations. This requirement is indicated in the monitoring and recordkeeping terms and conditions in emission units P011, P013, P025 and P029. BMCI was required to submit annual reports for year 2008 and 2009 by January 31st of the past two years. Therefore, BMCI is in violation of this requirement.
2. The emission units that are still considered as operating are P015 (BMC Extruder, ETR-023) and P021 (Mixer 01) based on the facility profile. BMCI will need to update the facility profile accordingly and shut down and emission units that have been permanently shut down. In addition, a permit revocation request (if applicable) should be submitted for the corresponding emission unit.

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3. During the inspection, it was mentioned that methylene chloride is no longer used in the cleaning solvents operation. However, the air toxics modeling is based on that hazardous air pollutant being used. BMCI is required to submit documentation of all of the cleaning solvents that have been used in the past two years (corresponding MSDS).
4. The emission units previously identified as Z012 through Z019 have been changed to P032 through P039, respectively. Installation and operation dates of those emission units were filled in randomly. Please review and correct the dates, if necessary.
5. In order to rectify the matter raised in #1, BMCI is required to submit two annual reports for years 2008 and 2009. Once these reports have been submitted and reviewed, the compliance status will then be reevaluated.

The information required must be submitted by no later than May 7, 2010. 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.

Thank you for giving us a tour of the facility and answering all of our questions. If you have any questions or comments about this letter, please feel free to contact me at (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, US EPA Region V
Tom Kalman, DAPC/CO
~~DAPC/NWDO File~~
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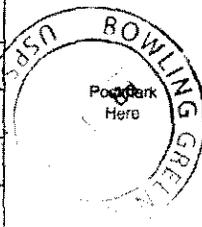
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