



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

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[www.epa.state.oh.us](http://www.epa.state.oh.us)

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

Re: Wood County  
Dillin Engineered Systems  
8030 Broadstone Road  
Perrysburg, OH 43551  
Premise #0387040428  
Notice of Violation

Certified Mail

May 31, 2007

Mr. Martin L. Shaffer  
General Manager  
Dillin Engineered Systems  
8030 Broadstone Road  
Perrysburg, OH 43551

Dear Mr. Shaffer:

This letter shall serve as follow-up to the inspection conducted at the above-referenced facility on May 4, 2007 by myself from the Northwest District Office (NWDO). The reason for the inspection was to determine the compliance status of the emissions unit operating at the facility with the rules and regulations of the Division of Air Pollution Control (DAPC).

I appreciated your cooperation during the unannounced inspection. Since a complete inventory was taken of the potential air emission units at the facility, the findings of this inspection can be summarized as follows:

1. The facility has existed at this location since 1995. The company was established twenty five years ago under the name of ROE, Incorporated. The facility has been doing business as Dillin Engineered Systems since 2000. The facility is in the business of manufacturing material handling systems.
2. A paint booth was witnessed at the facility. This paint booth has a manual spray gun that sprays air dry enamel onto parts. After viewing this piece of equipment and asking some questions, the paint booth would not qualify for a de minimis exemption as defined in Ohio Administrative Code (OAC) rule 3745-15-05. Therefore, the facility is in violation of not having obtained a Permit to Install (PTI) and a Permit to Operate (PTO) prior to installation and operation of this emissions unit pursuant to OAC rules 3745-31-02 and OAC 3745-35-02 as well as ORC 3704.05. The facility is required to apply for a PTI and PTO (and submit corresponding Emissions Activity Category form) by submitting these applications which can be found on Ohio EPA's website at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>.

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3. The facility is deemed in violation of not having submitted fee emission reports pursuant to OAC rule 3745-78. No records of paint usage were reviewed during the inspection. It is necessary that paint usage on a yearly basis for the past five years be submitted at this time. This information will be helpful in determining the facility status in terms of the Title V program. Once that determination has been made based on the information you supply, Central Office staff will be alerted of the correct categorization so that the facility is invoiced accordingly.
4. As discussed with you during the post-inspection meeting, you could utilize Ohio's Office of Compliance Assistance and Pollution Prevention (OCAPP) for assistance in filling out the paperwork. The NWDO representative of OCAPP is Mr. Ron Nabors. You may read more about OCAPP at the website <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The information requested above should be submitted to my attention no later than July 13, 2007. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the 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.

If you have any questions and/or concerns, please contact me at (419) 373-3118.

Sincerely,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control

/lb

pc: Don Waltermeyer, NWDO/DAPC  
Elisa Thomas, CO/DAPC  
Lisa Holscher, US EPA Region 5  
Samir Araj, NWDO/DAPC  
Tom Kalman, CO/DAPC  
NWDO/DAPC Wood County General File  
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