



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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 Korleski, Director

Re: Wood County
0387000362
Norplas Industries
Stack Test Results
Notice of Violation

May 8, 2007

CERTIFIED MAIL

Mr. Mark Steinmetz
Environmental Manager
Norplas Industries, Inc.
7825 Caple Road
Northwood, Ohio 43619

Dear Mr. Steinmetz:

The stack test conducted on March 5, 2003, to determine air contaminant emission rates from Ohio EPA emissions unit R001, has been reviewed. The testing was found to have been conducted in conformance with Ohio EPA methods and procedures. Our test review confirms the following reported data is accurate:

**Critical Test Data
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
CO	1.68 lbs/hr	1.3 lbs/hr	267.9 lbs VOC/hr	400 lbs VOC/hr
NO _x	1.83 lbs/hr	3.1 lbs/hr	267.9 lbs VOC/hr	400 lbs VOC/hr
VOC	4.4 lbs/hr (as carbon) 15.3 lbs/hr (as VOC)* 98.2% DRE** 98.1% DRE***	47.2 lbs/hr 95% control efficiency	267.9 lbs VOC/hr	400 lbs VOC/hr

* Assuming VOC is all melamine.

** Using Method 25A at RTO inlet.

*** Using method 25 at RTO inlet.

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Please note that the emission unit was not being operated in compliance with its allowable emissions rate for CO. The facility is therefore in violation of the Title V permit terms and conditions A.I.2.a.viii and A.V.3.h for this emissions unit, and is also in violation of Ohio Revised Code 3704.05.

Also, the emission unit was operating at an unacceptably low fraction of its maximum process weight rate. The "Source Operating Rate" in the above table was calculated by multiplying the adhesion promoter/basecoat/clearcoat application rate, in cc's/hr, by the VOC content of that material (lbs/gallon), and then summing over all materials applied. Because the report did not give VOC contents for the specific batches of materials sprayed during the stack test, the following contents were assumed: 6.42 lbs. VOC/gallon for the adhesion promoter, 5.0 lbs VOC/gallon for all basecoats, and 4.04 lbs. VOC/gallon for the clearcoat. These numbers represent high-side contents based on information in the 2006 test report and the MSDS sheets. The result still showed the paint line was operating at only 67% of its maximum VOC application rate. The Ohio EPA and USEPA can not accept compliance testing at less than the maximum rate.

For these reasons, it may be necessary to retest this unit. This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than June 1, 2007. 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 acknowledges receipt of the report for the stack test performed on R001 in November 1999. The purpose of that test was to measure the RTO destruction and removal efficiency. The result obtained - 96.0% - is consistent with the results obtained in the two subsequent stack tests on this unit.

You may contact your county engineer, Mohammad Smidi, should you have any questions and/or comments regarding this letter at (419) 373-3118.

Sincerely,



Robert G. Teer
Division of Air Pollution Control



Mohammad Smidi
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, US EPA Region 5
Mohammad Smidi, DAPC-NWDO
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