



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

April 25, 2007

CERTIFIED MAIL

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

Dear Mr. Steinmetz:

The stack tests conducted on December 12-13, 2006, to determine air contaminant emission rates from Ohio EPA emissions unit R001, have 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*
PM	1.3 lbs/hr	3.3 lbs/hr	213.2 lbs VOC/hr	400 lbs VOC/hr
PM ₁₀	0.63 lbs/hr	1.9 lbs/hr	222.1 lbs VOC/hr	400 lbs VOC/hr
CO	2.0 lbs/hr	1.3 lbs/hr	192.2 lbs VOC/hr	400 lbs VOC/hr
NO _x	1.24 lbs/hr	3.1 lbs/hr	205.4 lbs VOC/hr	400 lbs VOC/hr
VOC	3.66 lbs/hr (as carbon) 12.6 lbs/hr (as VOC)** 97.7% control efficiency	47.2 lbs/hr 95% control efficiency	192.2 lbs VOC/hr	400 lbs VOC/hr

* Calculated by multiplying the application rate of each coating or adhesion promoter, in lbs/hr, by the VOC weight fraction of that material, and summing over all coatings/adhesion promoters.

** Assuming VOC is all melamine.

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 being operated at 53.3% of its maximum process weight rate for the PM testing, 55.5% for the PM₁₀ testing, 51.4% for the NOx testing, and 48.1% for the testing of CO and VOC. The Ohio EPA and USEPA can not accept compliance testing at less than the maximum VOC application rate. It therefore 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.

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

/llr

pc: Don Waltermeyer, DAPC-NWDO
Lisa Holscher, US EPA Region 5
Mohammad Smidi, DAPC-NWDO
Robert Teer, DAPC-NWDO
Tom Kalman, DAPC/CO
Tom Sattler, DAPC-NWDO
Wendy Ordway, DAPC-NWDO
DAPC-NWDO File
Stack File

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front, if space permits.	<p>A. Signature <input type="checkbox"/> Registered Mail <input type="checkbox"/> Signature Required</p> <p>B. Received by (Printed Name) <i>Debra K. Nord</i> C. Date of Delivery <i>4/26/07</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
1. Article Addressed to: <i>MARK STEINMETZ GENERAL MERCH MANAGER NORRAS INDUSTRIES, INC 7825 MAPLE ROAD NORTHWOOD, OH 43615</i>	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

7005 1160 0002 4566 0665