



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

June 28, 2010

Mr. Mark Kimmel  
The Kimmel Corporation  
233 N. Sandusky Street  
Upper Sandusky, OH 43351

RE: Notice of Violation based on inspection of The Kimmel Corporation (0388010056) on June 15, 2010 with response due by July 23, 2010.

Dear Mr. Kimmel:

This letter shall serve as a follow-up to the inspection conducted on June 15, 2010 of the above referenced facility by this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

1. Prior to the June 30, 2008, launch of Air Services, The Kimmel Corporation (Kimmel) submitted permit to operate (PTO) applications for three petroleum dry cleaning machines. At the time, the Northwest District Office (NWDO) did not act on the facility's operating permit applications due to other priorities, such as processing Title V and synthetic minor permits. Recently, NWDO began processing more operating permit applications for non-Title V facilities.

A review of the facility's applications indicated that the emission units were installed in the 1980's. During the inspection we discussed the installation dates of the units and it was stated that two of the units were actually installed in 1955 while the third unit was installed in 1990. Installation of an emission unit without first obtaining a permit to install or permit to operate prior to installation is a violation of OAC rules 3745-31-02(A), 3745-35-02 (recently rescinded), and ORC 3704.05.

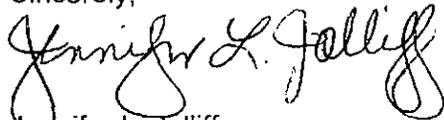
In order to correct the violation cited, Kimmel is required to submit a completed permit-to-install and operate (PTIO) application and emissions activity category (EAC) form for the dry cleaning machine installed in 1990. A copy of the PTIO application, EAC form and instructions were provided during the inspection, however, electronic forms are also available on Ohio EPA's website at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please include emissions calculations and a process flow diagram to aid the processing of the application. The information requested should be submitted no later than **July 23, 2010**.

Mr. Mark Kimmel  
June 25, 2010  
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2. Kimmel maintains petroleum usage records for the three dry cleaning units. Based on a review of the usage records, Kimmel utilizes less than 1500 gallons petroleum solvent on an annual basis for all three units combined.

I would like to take this opportunity to thank you for escorting me around the facility. Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address, by email at [jennifer.jolliff@epa.state.oh.us](mailto:jennifer.jolliff@epa.state.oh.us) or call (419) 373-4112.

Sincerely,



Jennifer L. Jolliff  
Division of Air Pollution Control

/lb

pc: Sam Araj, NWDO, DAPC  
Don Waltermeyer, NWDO, DAPC  
Tom Kalman, CO, DAPC  
Lisa Holscher, US EPA

~~NWDO, DAPC File~~