



State of Ohio Environmental Protection Agency

Northwest District Office

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Dec 31 07
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

Certified Mail

December 4, 2007

Mr. Dennis Derr, Safety and Environmental Coordinator
M-TEK, Inc.
1111 N Warpole St
Upper Sandusky, OH 43351

RE: Notice of Violation (NOV-HPF) for M-TEK, Inc. (0388010052) based on October 30, 2007 inspection with response due by December 28, 2007.

Dear Mr. Derr:

This letter shall serve as a follow-up to the inspection conducted on October 30, 2007, of the above referenced facility. 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. A review of the recordkeeping requirements for K001 through K006 demonstrated at the time of the inspection that M-TEK, Inc. (M-TEK) is not maintaining monthly records of coating and cleanup materials for each emissions unit individually. These records are required in order to report annually whether or not each emission unit was in compliance with the annual organic compound (OC) emission rate. Since the inspection, the company has revised its recordkeeping format and the changes are acceptable.
2. Emissions unit K008, maintenance paint booth, appeared to have not been used for painting recently and was being used for storage. A review of the facility's records demonstrated that K008 was operated back in June 2007 and a couple of days prior to that. K008's coating usage log stated that less than 10 gallons of coating was used, in accordance with the permit, however, daily emissions were never calculated. Term and condition C.1 of the PTI requires coating OC content and usage be collected and tabulated each day. Failure to maintain this record is a violation of PTI 03-17006 and ORC 3704.05.
3. As stated in the reporting requirement for each emission unit, the facility is required to submit a quarterly deviation report outlining any exceedances of the maximum allowable cumulative individual HAP and total combined HAPs emission limitations for K001-K008 and P001 combined, in addition to regenerative thermal oxidizer temperature deviations or daily OC emission rates. PTI 03-17006 was issued at the beginning of 2007's second quarter with the report due by July 31, 2007. The second quarter report was not submitted until October 30, 2007, during the inspection.

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4. During the preparation for the inspection, a file review indicated that permit-to-operate (PTO) applications for each emission unit had not been submitted. It was stated during the inspection that the PTO applications had been submitted prior to the inspection via Ohio EPA's STARShip program.

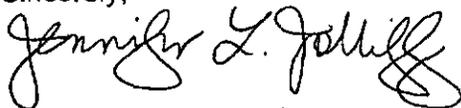
Upon my return, I was able to confirm that the application had in fact been submitted. However, a resubmittal is requested at this time because the information is submitted as a Title V permit application and not a state PTO application. Additionally, all of the emissions units included in the application are listed as Z00X sources when in fact Ohio EPA identities (K001, K002, etc) have been assigned. Since Ohio EPA is unable to change or correct the information submitted by the facility, a resubmittal of the applications as state PTOs is necessary.

5. It should be noted that Line 50, as presented in the PTI application and the latest emission unit description update submitted on July 13, 2007, is described as having no spray booths and no ovens. No PTI application has been submitted or processed for this emission unit. Should M-Tek decide to operate this line with emissions sources in the future, a PTI application will be required.

At this time, NWDO requests that M-TEK, Inc. submit revised coating records for review and revised PTO applications no later than December 31, 2007 to correct the violation. Please note 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.

I would like 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 (419) 373-4112 or electronically at jennifer.jolliff@epa.state.oh.us.

Sincerely,



Jennifer L. Jolliff
Division of Air Pollution Control

JLJ/lb

pc: Samir Araj, NWDO, DAPC
Don Waltermeyer, NWDO, DAPC
Tom Kalman, CO, DAPC
Lisa Holscher, US EPA
Follow up File

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