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REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

May 11, 2010

Certified Mail

Kathy Bassett
Dayton Polymeric Products
3337 North Dixie Drive
Dayton, OH 45414

**RE: OEPA Facility ID: 0857043129
Full Compliance Evaluation (FCE) February 4, 2010**

Dear Ms. Bassett,

WARNING LETTER

On February 4, 2010, the Regional Air Pollution Control Agency (RAPCA) conducted an inspection, as part of a Full Compliance Evaluation (FCE), of the Dayton Polymeric Products (DPP) facility located at 3337 North Dixie Drive in Dayton, Montgomery County, Ohio. The purpose of this letter is to address and seek resolution to issues discovered during the course of the FCE pertaining to emissions units (EUs) P001 (Mold Spray Cell) and P004 - P009 (Energy Absorbing Foam Molding Lines).

On May 6, 2009, Permit-to-Install and Operate (PTIO) P0093066, was issued to DPP for EUs P001 and P004 - P009, replacing Permit-to-Install (PTI) 08-04880. Pursuant to Part C.1.e of PTIO P0093066 for **EU P001 and P004 - P009**, DPP is required to submit quarterly deviation reports that identify the following:

- a. Deviations of the 75.8 tons per year (TPY) rolling 12-month limit on OC emissions from coatings, thinners and mold releases employed in EUs P001, P004, P005, P006, P007, P008 and P009.
- b. The probable cause of each deviation.
- c. Any corrective actions that were taken to remedy the deviations or prevent future deviations.
- d. The magnitude and duration of each deviation

To date, DPP has not submitted any quarterly deviation reports for the calendar year of 2009. If no deviations of permit terms and conditions occur during a reporting period, a report stating such must be submitted to satisfy the quarterly reporting requirements. Quarterly reports must be submitted by January 31 (4th quarter), April 30 (1st quarter), July 31 (2nd quarter), and October 31 (3rd quarter) of each year covering operations during the previous calendar quarter. Failure to submit quarterly deviation reports is a violation of PTIO P0093066 and ORC 3704.05.

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At this time, RAPCA requires that DPP submit all past due quarterly deviation reports identifying deviations of PTIO P0093066 for the 2nd, 3rd and 4th quarters of 2009 and the 1st quarter of 2010. These reports are required to be submitted electronically via the Air Services division of OEPA's online eBusiness Center within 14 days of receipt of this letter.

Additionally, Part C.1.d of PTIO P0093066 for **EU P001** states that DPP shall collect and record the following information for each day this EU is in operation:

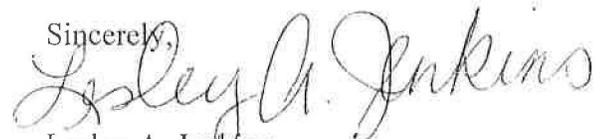
- a. The company identification for each coating, thinner and mold release material employed.
- b. The volume, in gallons, of each coating, thinner and mold release employed.
- c. The OC content of each coating, thinner and mold release, in percent by weight.
- d. The total OC emission rate for all coatings, thinners and mold releases, in pounds per day.

While on site February 4, 2010, RAPCA noted that DPP is not maintaining daily records for EU P001 as required. Failure to maintain daily records as required by permit terms and conditions is a violation of PTIO P0093066 and ORC 3704.05. **RAPCA requires that DPP submit a compliance plan including, at a minimum, measures to be taken by DPP to ensure that daily records are maintained for EU P001 as required by permit terms and conditions within 14 days of receipt of this letter.**

Finally, On March 23, 2010, DPP submitted the 2009 Annual Permit Evaluation Report (PER) electronically via Air Services. In that report, DPP stated that there were no deviations of monitoring, record keeping or reporting requirements. This is an inaccurate statement based on the fact that DPP failed to meet quarterly reporting requirements for 2009. **RAPCA requires that DPP submit a revised 2009 PER indicating the deviations of quarterly reporting requirements described above.**

Your prompt attention to this matter is greatly appreciated. Please respond with the requested information within 14 business days following receipt of this letter. Thank you for your time and cooperation. If you have any questions regarding this matter feel free to contact me at (937)225-4453.

Sincerely,



Lesley A. Jenkins
Air Pollution Control Specialist

cc: Jeff Canan, RAPCA
Tom Kalman, OEPA
Lisa Holscher, USEPA

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- 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.

1. Article Addressed to:

Kathy Bassett
 Dayton Polymeric Products
 3337 North Dixie Drive
 Dayton, OH 45414

2. Article Number
(Transfer from service label)

7002 2410 0007 8888 3417

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Kimberly Robinson Agent
 Addressee

B. Received by (Printed Name)

Kimberly Robinson

C. Date of Delivery

5/12/10

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

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PS Form 3811, February 2004

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Sent to: Kathy Bassett
 Street or P.O. Box: Dayton Polymeric Products
 City: 3337 North Dixie Drive
 Dayton, OH 45414

RS Form 3811 Instructions