

CETA ID: 6275  
Facility ID: 1576011632

**Subject:** Oster Response on 2009 compliance reports  
**From:** "Tischler, Philip C ALNC" <Philip.Tischler@ajoster.com>  
**Date:** Sat, 6 Feb 2010 21:13:22 -0500  
**To:** "Kelly Walker" <KWalker@cantonhealth.org>

Hi Kelly,

I reviewed the listed entries on our report and found that the data is correct. I found that all the incidents except one were related to our ACA 9147 coating. This item is a new application for the coating we normally run on the K001 line. The volume on this new item increased enough to give us the VOC hourly emission issue we are seeing. I do anticipate the trend will continue and would like to officially let you know that we did exceed our K002 PTI VOC emissions limit of 12 lb/hr on entries of the attached report.

As you mentioned our new permit will allow for a larger emission rate which will correct the problem.

I have developed a corrective action regarding the delayed notification on the emissions of K002. I have placed a warning alert into the data collection program for all the constraints of our permit so I will be notified when there is an issue. The corrective action will insure that I detect and provide a more timely notification of out of control values of our current VOC and HAP allowances.

Thanks for all the help on this,

Phil

-----Original Message-----  
From: Kelly Walker [mailto:KWalker@cantonhealth.org]  
Sent: Thursday, February 04, 2010 10:41 AM  
To: Tischler, Philip C ALNC  
Subject: RE: compliance reports

Hi Phil,

If you find errors in the report, please resubmit. Otherwise, no further action is required. When P0104770 is issued you'll just need to watch that neither line exceeds 22.8 lbs VOC/hr\*

Here are the instances I highlighted in the file:

Date	K002 lbs VOC/hr
11/17/09	- 13.13
11/11/09	- 24.1*
10/13/09	- 14.28
10/06/09	- 12.52
10/05/09	- 13.34
09/28/09	- 20.0
09/11/09	- 15.27
08/03/09	- 14.3
07/27/09	- 18.92
07/14/09	- 14.78
07/09/09	- 13.08
06/23/09	- 12.86
06/09/09	- 18.39
03/03/09	- 12.86
02/18/09	- 14.08
02/11/09	- 17.99

Thanks,

Kelly

>>> "Tischler, Philip C ALNC" <Philip.Tischler@ajoster.com> 2/4/2010 8:27 AM >>>  
Hi Kelly,

I was a bit confused on the report; I need to look into it more closely because we haven't had this issue in the past. I suspect the data entry may have some issues. If I do find a problem would it be recommended to resubmit the report? I typically did not look at the lb/hr in the past, it is unfortunate I missed this and feel responsible. I will be out of the office the rest of the day and will get back with you next week after I get a chance to see what happened on this report.

Phil

-----Original Message-----

From: Kelly Walker [mailto:KWalker@cantonhealth.org]  
Sent: Tuesday, February 02, 2010 3:26 PM  
To: Tischler, Philip C ALNC  
Subject: compliance reports

Hi Phil,

I reviewed the report for the second half of 2009. It looks like there were several instances throughout the year when K002 exceeded the maximum hourly VOC emission rate of 12 lbs/hr permitted in PTI 15-01649. I have to document the deviations in CETA since AJ Oster Foils is a synthetic minor (aka high priority) facility, but there will be no enforcement action because the new PTIO P0104770 takes care of the issue by raising the limit to 22.8 lbs VOC/hr.

I'm keeping my eye out for the public permit review comments to be posted (if any are even received) by the end of this week.

Thanks,  
Kelly

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