



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3896
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL #91 7108 2133 3932 4449 3480

September 22, 2010

Larry Hicks
Stanley Electric US Co., Inc.
420 E. High Street
London, OH 43140

Re: Notice of Violation (NOV) and Facility Inspection Conducted on August 18, 2010 at Stanley Electric US Co., Inc, Facility Premise # 0149000089

Dear Mr. Hicks:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates Stanley Electric's (Stanley) courtesy and cooperation extended during the August 18, 2010 inspection of your facility located at 420 E. High Street London, OH. The purpose of the inspection was to assure compliance with applicable permits along with state and federal rules and regulations. The inspection also included a review of files at CDO such as Title V certifications, quarterly and fee reports, etc.

The Title V Operating Permit was issued final on January 20, 2000 and contained terms and conditions for the following non-insignificant emissions units: R001, R003, R004, R006, R007, R009, R010, R012, R018, R019, R020, R021, R022 and R023. Of these units only R003, R022 and R023 are still operating at the facility. The following emissions units have been installed at the facility since issuance of the Title V permit with the appropriate permit(s) to install (PTI): R024, R025, R027, R028, R029, R030, R031, R032, R033, R034, R035, R036, R037, R038, R039, R040 R041 and R042. Emissions units R031, R034 and R035 have been disassembled, removed from the facility, and properly identified as 'permanently shutdown' in the Air Services facility profile.

Present during the inspection were Larry Hicks and Dave Walton of Stanley and Benjamin Halton of Ohio EPA, DAPC.

The inspection consisted of the following:

- a) an examination of each non-insignificant emissions unit at the facility,
- b) an examination of monitoring and record keeping files maintained at the facility, and
- c) a review of reporting and fee emission files maintained at CDO.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korieski, Director

Below is a summary of the inspection findings and action items that need to be addressed.

Finding 1:

R003 (Topcoat Line) with drying oven

This emissions unit was operating at the time of inspection. The coatings are infrared/ultra violet (IR/UV) cured. Methyl Isobutyl Ketone (MIBK) is used for clean up.

R022 (UV line 1) with drying oven

This emissions unit was operating at the time of inspection. The coatings are (IR/UV) cured. MIBK is used for clean up.

R023 (UV line 2) with drying oven

This emissions unit was not operating at the time of inspection. The coatings are IR/UV cured. MIBK is used for clean up.

R024 (UV hardcoat line 1) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. Naptha is used for product pre-wash. Acetone is used for clean up.

R025 (UV line 3) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. MIBK is used for clean up.

R027 (Decorative Line) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. Butyl Acetate is used for clean up.

R028 (UV Line 4) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. MIBK is used for clean up.

R029 (Anti-Fog Line 1) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. Propylene Glycol Monomethyl Ether (PGME) and Acetone are used for clean up.

R030 (Anti-Fog Line 2) with drying oven

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. Acetone is used for clean up.

R032 (molding machine #1), R033 (molding machine #10), R036 (molding machine #4).

R037 (molding machine #5), R038 (molding machine #36), R039 (molding machine #41) and R040 (molding machine #47)

These emissions units were operating at the time of inspection.

R041 (Combined Anti-Fog Line and Hardcoat line) with drying ovens

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. PGME and Acetone are used for clean up.

R042 (UV Line 5) with drying ovens

This emissions unit was operating at the time of inspection. The coatings are IR/UV cured. MIBK is used for clean up.

Thermal Oxidizer 20-1

Emissions units R022 and R023 exhaust to thermal oxidizer 20-1. This thermal oxidizer was operating at the time of inspection. No visible emissions were observed from this incinerator stack at the time of inspection. The incinerator downtime log identified times when the incinerator was not operating or not operating properly. During the most recent compliance demonstration (May 2007) the average combustion temperature of thermal oxidizer 20-1 was 1555°F. The operating temperatures of the chambers observed during the inspection were 1550°F and 1548°F.

Thermal Oxidizer 20-3

Emissions units R025 and R027 exhaust to thermal oxidizer 20-3. This thermal oxidizer was operating at the time of inspection. No visible emissions were observed from this incinerator stack at the time of inspection. The incinerator downtime log identified times when the incinerator was not operating or not operating properly. During the most recent compliance demonstration (March 2007) the average combustion temperature of thermal oxidizer 20-3 was 1555°F. The operating temperatures of the chambers observed during the inspection were 1569°F and 1552°F.

Thermal Oxidizer 20-4

Emissions units R041 and R042 exhaust to thermal oxidizer 20-4. This thermal oxidizer was operating at the time of inspection. No visible emissions were observed from this incinerator stack at the time of inspection. The incinerator downtime log identified times when the incinerator was not operating or not operating properly. During the most recent compliance demonstration (April 2008) the average combustion temperature of thermal oxidizer 20-4 was 1512°F. The operating temperatures of the chambers observed during the inspection were 1531°F and 1505°F.

Finding 2:

Thermal Oxidizer 20-2

Emissions units R003, R024, R028, R029 and R030 exhaust to regenerative thermal oxidizer (RTO) 20-2. This RTO was operating at the time of inspection. No visible emissions were observed from this incinerator stack at the time of inspection. The RTO downtime log identified times when the incinerator was not operating or not operating properly. During the most recent compliance demonstration (March 2007) the average combustion temperature of thermal oxidizer 20-2 was 1570°F. The operating temperatures of the chambers observed during the inspection were 1562°F and 1559°F. A review of operating records maintained for RTO 20-2 indicate that the set-point temperature was reset to a temperature below the minimum required temperature, following a power outage on September 4, 2009. Consequently, the RTO was operating out of compliance with the minimum temperature requirement established for RTO 20-2 from September 4 to September 8, 2009. Additionally, records maintained for RTO 20-2 indicate that the set-point temperature was reset to a temperature below the minimum required temperature, following a power outage on September 14, 2009. Consequently, the RTO has been operating out of compliance with the minimum temperature requirement established for RTO 20-2 since September 14, 2009.

Violation

Operating Thermal Oxidizer 20-2 below the average combustion temperature maintained during the most recent performance test is a violation of 40 CFR Part 63.4567(a)(2). Failing to identify deviations from the required operating limit in the semiannual compliance reports is a violation of 40 CFR Part 63.10(e)(3).

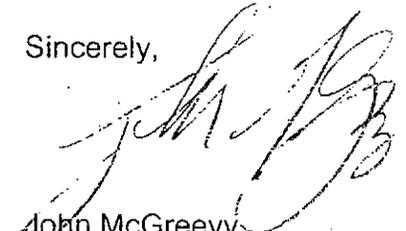
Requested Action(s):

1. CDO requests that Stanley immediately begin operating Thermal Oxidizer 20-2 at or above the minimum combustion temperature maintained during the most recent performance test.
2. CDO requests that Stanley review all of the semiannual compliance reporting periods that may have been effected by the deviations identified above and, if necessary, submit corrected semiannual compliance reports. The corrected reports should be submitted, via Air Services, within 30 days of receipt of this letter.
3. CDO requests that Stanley specifically address the combustion temperature operating limits and capture system operating limits established in accordance with 40 CFR Parts 63.4567(a)(2) and 63.4567(f)(2), respectively, in all future semiannual compliance reports for each of the applicable control devices and capture systems.

Larry Hicks
Stanley Electric US Co., Inc.
Page -5-

If you have any questions, please do not hesitate to contact Benjamin Halton of my staff at (614) 728-3809.

Sincerely,



John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

Enclosures: Ohio EPA - CDO Facility Evaluation Form & Emission Unit Evaluation Forms

cc: John McGreevy, DAPC/CDO
John Paulian, DAPC/CO
c: Adam Ward, DAPC/CDO
Ben Halton, DAPC/CDO

JM/BH/cl Inspection Letter 2010 - Stanley