



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL # 91 7108 2133 3932 4449 6504**

November 16, 2009

Mrs. Sue Ahrmann  
YUSA Corporation  
151 Jamison Road SW  
Washington Court House, OH 43160

Re: **Notice of Violation** based upon stack tests conducted on September 29, 2009, at  
YUSA Corporation  
Facility Premise # 0124010098  
Fayette County

Dear Mrs. Ahrmann:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), has completed a review of the stack tests conducted on regenerative thermal oxidizer (RTO) number 4 on September 29, 2009, at your facility located at 151 Jamison Road SW, in Washington Court House, Ohio. The purpose of this review was to evaluate the results of the stack tests with respect to the testing requirements and control efficiency requirements of the Title V permit and applicable permits-to-install (PTI).

As a result of this review, CDO has determined that several of the emissions units at the facility are operating out of compliance with the control efficiency requirements established in the applicable permits to install. Additionally, CDO has determined that the report does not include all of the information necessary to demonstrate compliance with 40 CFR, Part 51, Appendix M, Reference Method 204.

Listed below are "Findings" based upon a review of the stack test results for RTO #4. The "Findings" are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

**Finding 1:**

K021 Small parts manual spray booth no. 3. (PTI 01-12081)

K022 Small parts manual spray booth no. 4. (PTI 01-12081)

K064 Upper bracket (mushroom) adhesive application machine. (P0103947)

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

These emissions units are operating out of compliance with the control efficiency requirements established within the respective permit-to-install for each source. The terms and conditions of PTI 01-12081 and PTI P0103947 establish control efficiency requirements of 99% for the applicable control equipment to which emissions are vented (RTO #4). The results of the stack tests conducted on September 29, 2009 reveal that RTO #4 was achieving a destruction efficiency of 96%.

**Violation:**

Failure to comply with the control efficiency requirements for RTO #4 is a violation of the terms and conditions of PTI 01-12081 and PTI P0103947. Violation of the terms and conditions of a permit-to-install is also considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

**Requested Action(s):**

CDO acknowledges that YUSA has submitted a PTI application requesting a modification to the control efficiency requirements associated with EUs K021, K022 and K024. CDO anticipates that these violations will be resolved through the application review process and subsequent permit issuance.

**Finding 2:**

**K002 Manual adhesive spray booth**

The report for the tests conducted on September 29, 2009, suggests that the tests did not include a complete evaluation of Method 204 requirements for the enclosure associated with EU K002 based on a waiver received from CDO in August of 1996. Specifically, the test report indicates that the natural draft opening to enclosure area ratio (NEAR) and equivalent diameters (ED) were not evaluated for the purpose of demonstrating compliance with Method 204.

Be aware that although a waiver may have been granted with respect to Method 204 requirements for EU K002 in 1996, subsequent modifications to EU K002 and the PTIs issued in association with those modifications have superseded the aforementioned waiver. The terms and conditions for PTI 01-12081, issued 1/9/2007, and PTI 01-12190, issued 1/8/2008, both include requirements for the enclosure associated with EU K002 to satisfy Method 204 requirements.

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Additionally, CDO does not have the authority to waive method 204 requirements for any EU subject to the requirements of 40 CFR part 63, subpart M (National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products). In order to use the capture system and add-on control device option for demonstrating compliance with the MACT, the facility must evaluate the capture efficiency in accordance with 40 CFR part 63.3965.

**Requested Action(s):**

CDO acknowledges that although the language of the test report suggests that the NEAR was not evaluated for the enclosure associated with EU K002, the final page of the report includes the NEAR evaluation for the EU K002 enclosure among the results for the other enclosures. CDO requests that YUSA submit within fourteen days of receipt of this letter, the information necessary to evaluate each of the enclosures venting to RTO #4 for compliance with the ED requirement of Method 204.

Additionally, CDO request that YUSA submit within fourteen days of receipt of this letter, the electronic records of the static pressure readings for each of the enclosures venting emissions to RTO #4. These records are necessary for establishing parametric monitoring requirements for the purpose of demonstrating continuous compliance with the capture efficiency requirements of the MACT.

The following is a summary of items that CDO is requesting YUSA to submit:

Within fourteen days, please submit the information necessary to evaluate each of the enclosures venting to RTO #4 for compliance with the ED requirements of Method 204.

Within fourteen days, please submit electronic records of the static pressure readings for each of the enclosures venting emissions to RTO #4.

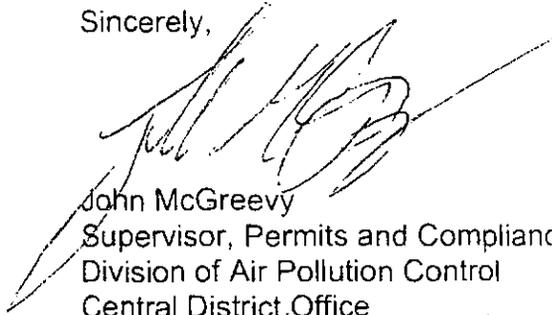
Please recognize that the above Findings and Violations were discovered as part of a review of the stack test results for the tests conducted on September 29, 2009.

Also, please note that Ohio Environmental Protection Agency has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information submitted pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by the Ohio Environmental Protection Agency at a later date.

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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

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

JM/cl YUSA NOV2 (2009)