



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) 726-3898  
www.epa.state.oh.us

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

**CERTIFIED MAIL # 91 7108 2133 3932 4449 6771**

November 5, 2009

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

Re: **Notice of Violation** based upon facility inspection conducted on August 21, 2009, at  
YUSA Corporation  
Facility Premise # 0124010098  
Fayette County

Dear Mrs. Ahrmann:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates YUSA Corporation's (YUSA) courtesy and cooperation extended during the August 21, 2009, full compliance evaluation of your facility located at 151 Jamison Rd SW, in Washington Court House, Ohio. The purpose of this inspection was to evaluate compliance with applicable state and federal air regulations, the facility's Title V permit and permits to install.

Present during the inspection were Hilarie Hart and Sue Ahrmann of YUSA and Benjamin Halton of Ohio EPA, DAPC.

The inspection consisted of the following:

1. an examination of each emissions unit at the facility;
2. an examination of monitoring and record keeping files maintained at the facility; and
3. a review of reporting and fee emissions files maintained at CDO.

Listed below are "Findings" based upon a review of emissions units at the facility, a review of specific record keeping maintained on site, specific process information, and reports and other documents submitted to Ohio EPA. The "Findings" are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

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

**Finding 1:**

K002 Manual adhesive spray booth.  
K009 Outer pipe machine no. 1.  
K010 Inner pipe machine no. 1.  
K011 Inner pipe machine no. 2.  
K012 Outer pipe machine no. 2.  
K017 Small parts manual spray booth no. 1.  
K018 Small parts manual spray booth no. 2.  
K021 Small parts manual spray booth no. 3.  
K022 Small parts manual spray booth no. 4.  
K024 Rotary adhesive dipping machine.

In April of 2009, the facility began directing emissions from those emissions units subject to control efficiency requirements to a new RTO (RTO #4). This RTO had not undergone performance testing necessary to demonstrate compliance with control efficiency requirements or to establish operating parameters that demonstrated continuous compliance with 40 CFR part 63, subpart M (National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products). Some of the emissions units have compliance deadlines (as established in 40 CFR part 63, subpart M and 40 CFR part 63, subpart A) that have passed. For these emissions units, it was not possible to demonstrate continuous compliance with the MACT requirements for the period of time that emissions were vented to the new RTO which had not demonstrated initial compliance with the control efficiency requirement nor established operating parameters that can be used to demonstrate continuous compliance.

**Violation:**

For emissions units that are operating beyond the applicable MACT compliance deadlines, directing HAP emissions to a control device that has not undergone the necessary performance testing is a violation of 40 CFR part 63, subpart M.

**Requested Action(s):**

CDO requests that YUSA conduct or have conducted performance testing necessary to demonstrate compliance with the requirements of 40 CFR part 63, subpart M and subpart A. In addition, CDO requests that YUSA prepare and submit a detailed compliance plan within 30 days of receipt of this letter. The plan should include a detailed description of how the facility intends to demonstrate compliance with the above mentioned testing requirements. The plan should include a timeline that identifies when the facility will submit the necessary ITT forms and conduct the required performance tests.

**Finding 2:**

**K002 Manual adhesive spray booth.**

This emissions unit (EU) was operating during the inspection. A review of records conducted during the inspection indicates that this EU exceeded the volatile organic compounds (VOC) tons per year (TPY) limitations identified in PTI 01-12081 and PTI 01-12190 in 2007 and 2008, respectively. The 2007 exceedance is attributed to the failure of the enclosure serving EU K002 to satisfy USEPA method 204. The enclosure requirements and associated exceedances were identified in the Notice of Violation (NOV) issued to YUSA on August 14, 2007. The enclosure was corrected and the facility applied for and received a permit modification (PTI 01-12190) for EU K002 on January 8, 2008. The 2008 exceedance is attributed to a malfunction in RTO #1 from May 19 to May 25, 2008, that resulted in uncontrolled emissions from EU K002. Pursuant to PTI 01-12190, the facility was required to begin keeping records of the actual pounds of VOC per gallon of coating solids, on a monthly basis, for each coating subsequent to the modification of EU K002 related to the issuance of PTI 01-12190.

CDO acknowledges that YUSA is keeping the records necessary to determine the actual pounds of VOC per gallon of coating solids for each coating utilized by K002, however, per the recordkeeping requirements identified in PTI 01-12190, YUSA is required to perform the calculation necessary to determine the actual pounds of VOC per gallon of coating solids for each coating. This recordkeeping requirement is necessary to demonstrate compliance with the 5.1 pounds of VOC per gallon of coating solids limitation established pursuant to OAC rule 3745-21-09(U)(1)(i). In addition, compliance with the capture and control requirements identified in PTI 01-12190 cannot be ascertained until such time that a compliance demonstration is performed on RTO #4 (See Finding 1).

**Violation:**

Failure to comply with the annual VOC limitation and to maintain the records necessary to demonstrate compliance with the applicable coating limitation are violations of the terms and conditions of PTI 01-12190. 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 taken measures to correct the emissions capture issues associated with the permanent total enclosure serving K002 and that a Start-up, Shutdown and Malfunction Plan is being utilized in order to avoid the annual exceedances that were documented in 2007 and 2008. CDO requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of PTI 01-12081.

**Finding 3:**

- K009 Outer pipe machine no. 1.
- K010 Inner pipe machine no. 1.
- K011 Inner pipe machine no. 2.
- K012 Outer pipe machine no. 2.

EUs K009, K010 and K012 were not operating during the inspection. EU K011 was operating during the inspection. A review of records conducted during the inspection indicates that these emissions units have not exceeded the hourly or annual VOC limitations identified in the Title V permit. In addition, compliance with the capture and control requirements identified in the Title V permit cannot be ascertained until such time that a compliance demonstration is performed on RTO #4 (See Finding 1).

**Finding 4:**

- K017 Small parts manual spray booth no. 1.
- K018 Small parts manual spray booth no. 2.
- K021 Small parts manual spray booth no. 3.
- K022 Small parts manual spray booth no. 4.

These EUs were operating during the inspection. A review of records conducted during the inspection indicates that these emissions units have not exceeded the hourly or annual VOC emissions limitations identified in the Title V permit and PTI 01-12081. Pursuant to the Title V permit and PTI 01-12081, individual VOC emissions limitations and recordkeeping requirements have been established for each of these EU's. YUSA is currently keeping combined records for EUs K017 and K018 and combined records for EUs K021 and K022. For the purpose of demonstrating compliance with the individual emissions limitations, the current practice of keeping combined records can only be used to demonstrate compliance with the individual limitations if the combined actual emissions levels are below each of the applicable individual emissions limitations. In addition, compliance with the capture and control requirements identified in PTI 01-12081 cannot be ascertained until such time that a compliance demonstration is performed on RTO #4 (See Finding 1).

**Violation:**

As identified in PTI 01-12081, YUSA is required to maintain independent records for each of the EUs and to use these records to evaluate compliance with the emissions limitations established for the individual EUs. Failure to keep records for the individual EUs is a violation of the terms and conditions of PTI 01-12081. 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 requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of the Title V permit and PTI 01-12081.

**Finding 5:**

**K024 Rotary adhesive dipping machine.**

This EU was operating during the inspection. A review of records conducted during the inspection indicates that this emissions unit has not exceeded the annual VOC emissions limitation identified in PTI 01-12190. Pursuant to PTI 01-12190, the facility was required to begin keeping records of the actual lbs VOC per gallon of coating solids, on a monthly basis, for each coating subsequent to the modification of EU K024 related to the issuance of PTI 01-12190. CDO acknowledges that YUSA is keeping the records necessary to determine the actual pounds of VOC per gallon of coating solids for each coating utilized by K024, however, per the recordkeeping requirements identified in PTI 01-12190, YUSA is required to perform the calculation necessary to determine the actual pounds of VOC per gallon of coating solids for each coating. This recordkeeping requirement is necessary to demonstrate compliance with the 5.1 pounds of VOC per gallon of coating solids limitation established pursuant to OAC rule 3745-21-09(U)(1)(i). In addition, compliance with the capture and control requirements identified in PTI 01-12190 cannot be ascertained until such time that a compliance demonstration is performed on RTO #4 (See Finding 1).

**Violation:**

Failure to maintain the records necessary to demonstrate compliance with the applicable coating limitation is a violation of the terms and conditions of PTI 01-12190. 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 requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of PTI 01-12190.

**Finding 6:**

K030 Resin line no. 2.

K054 Resin line no. 3.

K056 Resin line no. 4.

These EUs were operating during the inspection. A review of records conducted during the inspection indicates that EU K030 exceeded the 1.05 TPY OC emissions limitation identified in PTI 01-08669 for calendar years 2006, 2007 and 2008 (See Action Item #4). Records also indicate that EUs K030, K054 and K056 have not exceeded the 40 lbs OC per day limitations identified in PTI 01-08669, 01-12117 and 01-12220 respectively; however, compliance with the 8 lb per hour limitations for each of these EUs cannot be ascertained because the facility is not keeping records of the hours of operation as required by the respective permits.

**Violation:**

Failure to comply with the annual emission limitation for EU K030 and to maintain the records necessary to demonstrate compliance with the 8 lb/hr OC limitation for EUs K030, K054 and K056 are violations of the terms and conditions of PTI 01-08669, 01-12117 and 01-12220. Violation of the terms and conditions of a permit-to-install is also 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 requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of PTI 01-08669, 01-12117 and 01-12220.

Additionally, CDO requests that YUSA submit a PTI application, via Air Services, that properly identifies the potential emissions for EU K030. CDO acknowledges that YUSA submitted a Chapter 31 modification request for EU K030 on October 21, 2009. Pending a review of this application, no further action is required.

**Finding 7:**

K031 Touch-up spray painting

This EU was not operating during the inspection. A review of records conducted during the inspection indicates that this EU has not exceeded the hourly or annual VOC limitations or the VOC content limitation identified in PTI 01-12106. Records also indicate that this EU last operated in December 2008.

**Finding 8:**

- K032 Inner pipe brush adhesive machine no. 1.
- K033 Inner pipe brush adhesive machine no. 2.
- K034 Inner pipe brush adhesive machine no. 3.
- K035 Inner pipe brush adhesive machine no. 4.

These EUs were not operating during the inspection. A review of records conducted during the inspection indicates that these EUs have not exceeded the daily coating usage limitation of 10 gallons per day or the annual VOC limitations of 5.82 TPY identified in PTI 01-12081.

**Finding 9:**

- K036 Inner pipe brush adhesive machine no. 5.
- K037 Inner pipe brush adhesive machine no. 6.

PTI 01-08791 was issued final on May 11, 2004, allowing installation of these EUs; however, they have not been installed. Be aware that authorization to install these EUs may have terminated if YUSA has not undertaken a continuing program of installation. Should YUSA decide to install these EUs, a new permit application may be required.

**Finding 10:**

K042 Manual brush application process no. 1.  
K043 Manual brush application process no. 2.  
K057 Manual brush application process no. 3.  
K058 Manual brush application process no. 4.  
K059 Manual brush application process no. 5.  
K060 Manual brush application process no. 6.

These EUs were not operating during the inspection. A review of records conducted during the inspection indicates that these EUs have not exceeded the daily coating usage limitations of 10 gallons per day or the annual VOC emissions limitations identified in PTIs P0104253 and P0104269. Pursuant to PTIs P0104253 and P0104269, individual recordkeeping requirements have been established for each of these EU's in order to demonstrate that each EU uses less than 10 gallons of coating per day and emits less than 10 TPY of VOC. YUSA is currently keeping combined records for EUs K042, K043, K057, K058, K059 and K060. For the purpose of demonstrating compliance with the individual EU limitations, the current practice of keeping combined records can only be used to demonstrate compliance with these limitations if the combined actual daily coating usage levels and actual annual VOC emissions levels are below each of the applicable individual limitations. In addition, compliance with the capture and control requirements identified in PTIs P0104253 and P0104269 cannot be ascertained until such time that a compliance demonstration is performed on RTO #4.

**Violation:**

As identified in PTI P0104253 and P0104269, YUSA is responsible for maintaining independent records for each of the EUs. Failure to keep records for the individual EUs is a violation of the terms and conditions of PTI P0104253 and P0104269. Violation of the terms and conditions of a permit-to-install is also 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 requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of PTI P0104253 and P0104269.

**Finding 11:**

K044 Outer pipe brush adhesive machine no. 1.

K045 Outer pipe brush adhesive machine no. 2.

These EUs were not operating during the inspection. A review of records conducted during the inspection indicates that these EUs have not exceeded the daily coating usage limitation or annual VOC emissions limitations identified in PTI 01-01348.

**Finding 12:**

K053 Indexed table adhesive spray booth no. 1.

PTI 01-12081 was issued final on January 9, 2007 allowing installation of this EU; however, EU K053 has not been installed. Be aware that authorization to install this EU may have terminated if YUSA has not undertaken a continuing program of installation. Should YUSA decide to install this EU, a new permit application may be required.

**Finding 13:**

K061 Top hat adhesive application machine.

K062 Straight outer pipe adhesive application machine no. 1.

K063 MT bracket/T-rod adhesive application machine.

K064 Upper bracket (mushroom) adhesive application machine.

K065 Flex A inner pipe spray adhesive application machine.

K066 Maskless straight outer pipe adhesive application machine no. 2.

K067 Stopper bracket/heavy weight adhesive application machine.

PTI P0103947 was issued final on April 1, 2009. EUs K061, K062, K063, K065, K066 and K067 have not yet been installed. Pursuant to PTI P0103947, the facility was required to begin keeping records of the actual pounds of VOC per gallon of coating solids, on a monthly basis, for each coating utilized by K064. CDO acknowledges that YUSA is keeping the records necessary to determine the actual pounds of VOC per gallon of coating solids for each coating utilized by K064; however, per the recordkeeping requirements identified in PTI P0103947, YUSA is required to perform the calculation necessary to determine the actual pounds of VOC per gallon of coating solids for each coating. This recordkeeping requirement is necessary to demonstrate compliance with the 5.1 pounds of VOC per gallon of coating solids limitation established pursuant to OAC rule 3745-21-09(U)(1)(i). In addition, compliance with the capture and control requirements identified in PTI P0103947 cannot be ascertained until such time that a compliance demonstration is performed on RTO #4 (See Finding 1).

**Violation:**

Failure to maintain the records necessary to demonstrate compliance with the applicable coating limitation is a violation of the terms and conditions of PTI P0103947. Violation of the terms and conditions of a permit-to-install is also 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 requests that YUSA immediately begin keeping records as outlined in the *Monitoring and Recordkeeping* section of PTI P0103947.

EU K064 was installed on July 2, 2009. Per the requirements of PTI P0103947, the facility was responsible for completing the testing requirements for EU K064 within 3-months after start-up (October 2, 2009). In order to accommodate a reasonable installation schedule for all of these emissions units and to allow for an efficient testing schedule, CDO requests that YUSA submit, via Air Services, an application to administratively modify PTI P0103947 that identifies a testing deadline for these EUs. CDO acknowledges that YUSA submitted an application to administratively modify PTI P0103947 on October 2, 2009. Pending a review of this application, no further action is required.

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

Within thirty days, please submit a compliance plan and schedule that includes a detailed description of how the facility intends to demonstrate compliance with continuous compliance requirements of 40 CFR part 63, subpart M. The plan should include a timeline that identifies when the facility will submit the necessary ITT forms and conduct the required performance tests.

Please recognize that the above Findings and Violations were discovered as part of YUSA Corporation's compliance evaluation. They were based upon observations and information reviewed for each emissions unit listed in the applicable PTIs and the Title V permit.

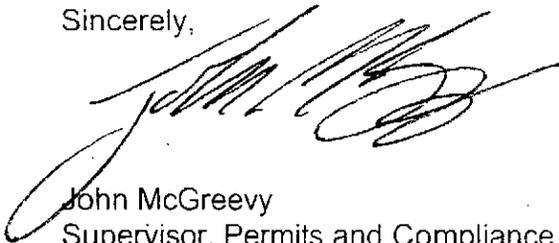
Also, please note that Ohio Environmental Protection Agency has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or

Mrs. Ahrmann  
YUSA Corporation  
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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.

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