



State of Ohio Environmental Protection Agency

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August 14, 2007

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

**Re: Facility Inspection conducted on June 28, 2007, at YUSA Corporation
Facility ID # 01-24-01-0098, Notice of Violation: ORC 3704.05(c)**

Dear Mrs Ahrmann:

Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates YUSA Corporation's (YUSA) courtesy and cooperation extended during the June 28, 2007 compliance evaluation of your facility located at 151 Jamison Road SW in Washington Court House, Ohio. The purpose of the inspection was to evaluate compliance with applicable state and federal air regulations.

The Title V operating permit was issued final on July 21, 2001, and contains terms and conditions for the following non-insignificant emissions units (EU): K002, K009, K010, K011, K012, K013, K014, K016, K017, K018, K021, K022, K024, K025 and K027. EU K013, K014, K016 and K027 have been removed from the facility and EU K025 is currently out of service. Since issuance of the Title V permit, permits-to-install (PTIs) have been issued for the following non-insignificant emissions units: K028, K029, K031, K032, K033, K034, K035, K038, K039, K040, K041, K042, K043 and K053. EU K028, K029, K038, K039, K040, K041 and K053 have not been installed at the facility.

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

The inspection consisted of the following:

- a) an examination of each non-insignificant emissions units at the facility,
- b) a walkthrough of the entire facility,

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

- c) an examination of monitoring and record keeping files maintained at the facility and,
- d) a review of reporting and fee emission files maintained at CDO.

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

Finding 1 - Recordkeeping of hours of operation for the following emissions units:

- K002 - Manual Adhesive Spray Booth**
- K009 - Outer Pipe Machine**
- K010 - Inner Pipe Machine**
- K011 - Inner Pipe Machine**
- K012 - Outer Pipe Machine**
- K017 - Small Parts Manual Spray Booth #1**
- K018 - Small Parts Manual Spray Booth #2**
- K021 - Manual Spray Booth #1**
- K022 - Manual Spray Booth #2**
- K024 - Rotary Adhesive Dipping Machine**

A review of on-site records established that record keeping requirements were not maintained in accordance with the record keeping requirements of YUSA's Title V Permit issued July 27, 2001. Specifically, YUSA has not recorded the hours of operation for EUs K002, K009, K010, K011, K012, K017, K018, K021, K022 and K024. The "Terms and Conditions for Emissions Units" section for each of the above listed emissions units (Section A.III.2.g of the Title V permit) states the following:

"The permittee shall collect and record the following information for each day for this emissions unit:

- g) The total number of hours the emissions unit was operated.*

This recordkeeping requirement is necessary for the facility to demonstrate compliance with the applicable Organic Compound (OC) pound per hour limitation for each of the above listed emissions units.

Violation:

With respect to the above listed emissions units, failure to maintain records depicting hours of operation constitutes a violation of the Title V permit and Ohio Revised Code (ORC) 3704.05(C). Please note, ORC 3704.05(C) 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."

Action:

On July 25, 2007, YUSA submitted a revised Title V application in order to incorporate the terms and conditions of PTI # 01-12081 for EUs K002, K021, K022 and K024. Incorporation of the revised terms and conditions would relieve YUSA of the requirement to record the hours of operation for EUs K002, K021, K022 and K024. Regarding emissions units K009, K010, K011, K012, K017 and K018; CDO requests that YUSA expeditiously begin complying with the record keeping requirements and record the hours of operation as required in the Title V permit. Compliance with the applicable short term limitations should be identified for each of these emissions units in the quarterly deviation reports.

Finding 2 – Incomplete capture from the Permanent Total Enclosure associated with EU K002

K002 - Manual Adhesive Spray Booth

An inspection of EU K002 revealed that wet parts and parts racks were exiting the permanent total enclosure (PTE) associated with EU K002 resulting in incomplete capture of organic compounds. Emissions testing on the Regenerative Thermal Oxidizer (RTO) that controls emissions from EU K002 (RTO#1) verified that the PTE met Method 204 requirements and assumed 100% capture of the PTE. However, because all coating/solvent flash-off, curing and drying does not occur within the capture system, 100% capture can not be assumed. Furthermore, the results of the emissions testing are considered to be invalid as a result of incomplete/unmeasured capture.

Violation:

Failure to properly evaluate the control efficiency of the PTE and RTO is a violation of the Title V permit and ORC 3704.05(C). Please note, Ohio Revised Code (ORC)

3704.05(C) 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."

Action:

CDO requests that YUSA prepare a detailed compliance plan outlining how the facility intends to correct the deficiencies related to capture and control of emissions from EU K002. The plan should be submitted within 45 days of receipt of this letter and should include a preliminary schedule, with dates. The plan should include a description of how YUSA intends to achieve and maintain 100% capture and when an intent-to-test (ITT) will be submitted and testing conducted.

Finding 3 – Failure to comply with 40 CFR Part 63, Subpart M

Facility Wide

It has been determined that YUSA is subject to the requirements of 40 CFR Part 63, Subpart M the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.

To date, the facility has failed to comply with the requirements of this subpart including but not limited to the following:

- 1) Submittal of the initial notification by January 2, 2005. (40 CFR, Part 63.3910)
- 2) Preparation of a Startup, Shutdown and Malfunction Plan by January 2, 2007. (40 CFR, Part 63.3900)
- 3) Preparation of a Work Practice Plan by January 2, 2007. (40 CFR, Part 63.3900)
- 4) Recordkeeping requirements necessary to demonstrate compliance with the applicable emissions limitations of the subpart beginning January 2, 2007. (40 CFR, Part 63.3930)
- 5) Emissions testing conducted in accordance with the provisions of the subpart by January 2, 2007. (40 CFR, Part 63.3960) (40 CFR, Part 63.3965)

- 6) Installation, Operation and Maintenance of a Continuous Parametric Monitoring Systems (CPMS) for emissions units subject to the requirements of Subpart M MMM by January 2, 2007.

Violation:

The findings described above constitute a violation of 40 CFR Part 63, Subpart M MMM. Consequently, failure to comply with 40 CFR Part 63, Subpart M MMM is also a violation of each of the following PTIs which include the terms of Subpart M MMM:

01-12081 issued 01/09/2007; EUs K002, K021, K022, K024, K032, K033, K034 and K035;

01-01348 issued 02/16/2006; EUs K044 and K045;

01-08966 issued 07/26/2005; EUs K042 and K043;

01-08791 issued 09/15/2003; EUs K032, K033, K034, K035, K036 and K037 and

01-08720 issued 07/08/2003; EU K027.

With respect to the above listed PTIs, failure to comply with the applicable requirements of 40 CFR Part 63, Subpart M MMM constitutes a violation of the PTI, ORC 3704.05(C) and 40 CFR Part 63, Subpart M MMM. Please note, Ohio Revised Code (ORC) 3704.05(c) 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."

Action:

CDO requests that YUSA prepare a detailed compliance plan outlining how the facility intends to correct the deficiencies related to compliance with 40 CFR Part 63, Subpart M MMM. The plan should be submitted within 45 days of receipt of this letter and should include a preliminary schedule outlining when goals related to compliance with the subpart will be met.

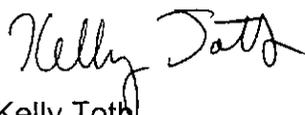
Summary of Actions for Remedy

1. YUSA should immediately begin and maintain all required record keeping for K009, K010, K011, K012, K017 and K018.
2. YUSA should prepare a detailed compliance plan outlining how the facility intends to correct the deficiencies related to capture and control of emissions from EU K002. The plan should be submitted within 45 days of receipt of this letter.
3. YUSA should prepare a detailed compliance plan outlining how the facility intends to correct the deficiencies related to compliance with 40 CFR Part 63, Subpart M. The plan should be submitted within 45 days of receipt of this letter.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the requested compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact me or Ben Halton at (614)-728-3809.

Sincerely,



Kelly Toth
Air Permits and Compliance Supervisor
Division of Air Pollution Control
Central District Office

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

c: Benjamin T. Halton, DAPC/CDO
Isaac Robinson III, DAPC/CDO
John Paulian, DAPC/CO