



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) 728-3898
www.epa.state.oh.us

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

CERTIFIED MAIL 7006 2760 0005 5171 5622

June 1, 2007

Mike Sarver
Environmental Specialist
TS Trim Industries
59 Gender Road
Canal Winchester, OH 43110

Re: Notice of Violation - Non-compliance with the Title V permit based on emission test report from March 20, 2007, and receipt of an incomplete Title V Compliance Certification

Dear Mr. Sarver:

The Central District Office (CDO), Division of Air Pollution Control (DAPC), staff completed a review of the emission test report received on May 1, 2007, and the compliance certification received on April 20, 2007. Below is a summary of our findings and any action items that may need to be addressed.

Emission Testing

Industrial Air Science conducted USEPA Method 25a analysis for organic compounds (OC) vented to the main trunk duct prior to the two (2) rotating carbon beds and on the combined exhaust from the thermal oxidizer and carbon beds on March 20, 2007. The Title V permit required emission testing to be conducted six (6) months prior to permit expiration in section A.V.1.a for emissions units R019, R020, R021 and R025. During the term of the Title V permit that expired on January 9, 2007, TS Trim notified Ohio EPA that adhesive usage rates had decreased and that booth CC-1, identified as emissions unit R024, was removed from service.

Emission testing was conducted without supplemental solvent input, as done during previous emission tests. CDO staff observed that the digital readout from the parametric monitoring system reporting non-methane OC from the carbon bed and pressure drop across the permanent total enclosure (PTE) appeared to be operating. Industrial Air Science demonstrated inward air flow at the loading dock door, at the rear facility door and at the entrance to the cafeteria with smoke tubes.

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

Findings: CDO staff reviewed the inlet and outlet emission data in the summary table of VOC destruction efficiency in Appendix A of the test report submitted on May 1, 2007. The outlet mass loading averaged 14.8 lbs OC/hr as propane over three runs and did not exceed the 38.4 lbs OC/hr hourly emission limitation even with application of a response factor of 1.5 determined during a previous emissions test.

The emission test report demonstrated compliance with hourly allowable emission limitation and with criteria for a permanent total enclosure, as required in sections A.I.1 and A.I.2.c, respectively, which state:

"The organic compound (OC) emissions from emissions units R019, R020, R021, R024, and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions." ;

and

"The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation."

However, TS Trim violated section A.I.1.b in the Title V permit for emissions units R019, R020, R021, and R025 based on the reported 66.9% average destruction efficiency in the summary of VOC destruction efficiency table, which states:

"The OC emissions shall be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight."

Violation: TS Trim violated the Ohio Revised Code (ORC) Section 3704.05(c) for violating the terms and conditions of a Title V permit. Be advised, ORC rule 3704.05(c) states:

"No person who is a 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."

Compliance Certification:

TS Trim reported intermittent compliance in the Title V Compliance Certification report received on April 24, 2007, for deviations in which records were not maintained of the differential pressure across the PTE during 237 days. In addition, TS Trim reported deviations during 123 days in which records were not maintained of the non-methane OC

concentration in the exhaust gases from the carbon bed concentrator. TS Trim reported 145 days in which records were not maintained of the average combustion temperature within the thermal oxidizer.

Findings: The compliance certification did not report the probable cause and corrective action taken to eliminate the deviations resulting from a malfunction of the parametric monitoring system. It appears that the number of malfunctions is excessive and has not been corrected. CDO is requesting a plan describing how TS Trim will correct and prevent future malfunctions as required under the Ohio Administrative Code (OAC) Section 3745-15-06(D) which states:

If, in the judgment of the director, excessive or unduly prolonged malfunctions of any emission source, air pollution control equipment or related facility have occurred, the director may require the owner or operator of said source, equipment or related facility to prepare, submit and implement a preventive maintenance and malfunction abatement plan which is acceptable to the director. Such plan shall be designed to prevent, detect and correct malfunctions or equipment failures which could result in emissions exceeding any applicable law.

Findings: In addition, the certification report did not report that emission test was not conducted within six (6) months prior to expiration of the Title V permit, as required in section A.V.1.a of the Title V permit, which states:

"The emission testing shall be conducted within six (6) months prior to permit expiration."

Violations: TS Trim violated the Ohio Revised Code (ORC) Section 3704.05(c) for violating the terms and conditions of a Title V permit. Be advised, ORC rule 3704.05(c) states:

"No person who is a 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 Items: Please submit the following compliance plan and schedule outlining an action plan to return TS Trim to compliance with the terms and conditions of the Title V permit.

| <u>Milestone</u> | <u>Completion Date</u> |
|--|------------------------|
| 1. The date by which TS Trim will submit a proposed plan and schedule to improve the capture and control efficiency to achieve 90% VOC destruction efficiency: | _____ |

2. The date by which TS Trim proposes to demonstrate 90% destruction efficiency of VOC from emission units R019, R020, R021, and R025: _____
3. The date by which TS Trim will submit, in writing, the cause and any actions taken to correct and prevent malfunctions of the parametric monitoring system: _____
4. The date by which TS Trim will submit, in writing, a revised Compliance Certification listing failure to conduct emission testing within six (6) months prior to Title V expiration date: _____

Please submit all of the requested information within thirty (30) days of receipt of this letter. If you have any questions concerning the issues addressed in this letter, you may contact John Kirwin at (614) 995-0673.

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 compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline such penalties in this case will be made by Ohio EPA at a later date.

Sincerely,



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

- c: John Kirwin, Environmental Specialist, DAPC/CDO
Isaac Robinson, Manager, DAPC/CDO
John Paulian, Ohio EPA, DAPC/CO
Andrew D. Shroads, QEP, Project Manager, August Mack Environmental