Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 16, 2011

Joyce Kolakowski, Safety and Environmental Coordinator
Meteor Sealing Systems LLC
400 S. Tuscarawas Ave.
Dover, OH 44622

Re: Tuscarawas County
Meteor Sealing Systems LLC; Facility ID #0679015004
Warning Letter

Dear Ms. Kolakowski:

On April 27, 2011, Ohio EPA, Division of Air Pollution Control (DAPC), Southeast District Office (SEDO) began working on an application for a permit-to-install and operate (PTIO) for a new coating operation, emissions unit (EU) R003, at Meteor Sealing Systems' Dover facility. While the permit for the new source was issued and became effective on August 29, 2011, a more comprehensive evaluation of the air contaminant sources at the facility during the permitting process has revealed violations of Ohio's air pollution control regulations as described below.

***(1) Installation and modification of sources without receipt of permits.*** OAC rule 3745-31-02(A)(1) prohibits the installation or modification, and subsequent operation of any new source without first obtaining a PTIO from the Director of Ohio EPA. Since Meteor Sealing Systems began operation of its Dover facility in 1999, several air contaminant sources have been installed without application for or receipt of air permits. The sources installed without permits include Extrusion Line #2 (EU R001), Robot Line #1 (EU R002), the C6 Coating Booth (EU R004), the RRGS Coating Booth (EU R005), the JS27 Coating Booth (EU R006) and the flocking line (no source ID assigned). Although initial emissions calculations for EU R002 may have indicated that Robot Line #1 had the potential to emit of less than 10 pounds per day when it was installed in 1999, this source was no longer eligible for de minimis status upon installation of EU R001 when the potential volatile organic compound (VOC) emissions from the similar sources at the facility exceeded 25 tons per year, combined (see OAC rule 3745-15-05(C)(4)). The three smaller booths installed in 2005-2006 were ineligible for de minimis status for the same reason. The flocking line that you informed me was installed in March of 2011 was observed in operation during DAPC, SEDO's site visit on July 28, 2011. Based on the information you provided during our call on November 7, 2011, potential VOC emissions from the flocking line exceed 25 tons per year, thus a PTIO was required for this EU prior to its installation.

Also based on the information you provided during and subsequent to our discussion on November 7, 2011, Robot Line #2 (EU R003) that was permitted in PTIO #P0108529 has been modified as defined in OAC rule 3745-31-01(QQQ). I agree that the change from the Autoseal primer to the Whitford primer in the new coating booth (EU R003) does not constitute a modification under Ohio's "Toxic Air Contaminant Statute" because potential toluene emissions are still less than 80% of the toluene MAGLC. However, the Whitford

Southeast District Office
2195 Front Street
Logan, OH 43138-8637
740 | 385 8501
740 | 385 6490 (fax)
www.epa.ohio.gov

primer has a higher VOC content than the Autoseal, so the change constitutes a Chapter 31 modification of the new EU because the change in coating is resulting in an increase in allowable VOC emissions from EU R003. The amount of VOC emissions increase may not be very significant and varies depending on the maximum number of gallons of the Whitford primer that can be used in the new booth each year. You mentioned that the coating application rate is the same for both primers, and the current VOC limits are based upon a maximum primer use rate of 507 gallons per year (0.058 gallon/hr). However, because the Whitford Primer is slightly heavier than the Autoseal, a maximum application rate of 0.034 kg/set of parts and 48,000 sets per year (5.48 sets per hour) would yield a lower annual use rate of 495.67 gallons (0.057 gallon/hr). At 0.057 gallon/hr and a VOC content of 7.1 lbs/gallon for the Whitford primer, the potential hourly VOC emissions from the use of the new/alternate primer would be 0.40 lb VOC/hr. When these VOC emission rates are added to the topcoat VOC emission rates, the potential VOC emissions from EU R003 are 0.57 lb/hr (instead of 0.56 lb/hr) and 2.50 tons per year (instead of 2.46 tons per yr). However, if there is a potential that 507 gallons of the Whitford primer could be used in a year (instead of just 495.67 gallons), the potential VOC emissions from the primer use would be 0.41 lb VOC/hr for total VOC emissions of 0.573 lb/hr and 2.51 ton per year from this source. In either case, Meteor Sealing Systems has modified EU R003 without first obtaining a PTIO for the modification.

To address the PTIO violations, Meteor Sealing Systems must obtain initial or modification PTIOs for all of the air contaminant sources. While PTIO #P0105045 was issued on September 30, 2009 for EUs R001 and R002, Meteor Sealing Systems has requested an administrative modification of this PTIO to correct emissions limitations that were established using improperly calculated VOC emission rates; these emissions rates are being exceeded as detailed in the company's most recent Permit Evaluation Report (PER) received on March 9, 2011. An application for a Federally Enforceable PTIO (FEPIO) for EUs R004-R006 was received on July 26, 2011, but as is detailed below, this application must be updated to address the potential hazardous air pollutants (HAPs) from the flocking line. An application for a Chapter 31 modification of EU R003 is needed, and an application for a PTIO for the flocking line must also be submitted. However, you mentioned that the current coating used on the flocking line is not working well and that other coatings are being evaluated as alternatives, so I recommend that the company submit a permit application for this operation it if it is still needed once a more desirable coating is found.

***(2) Title V status based on HAP emissions.*** Based on the use rate and coating information you provided during our discussion on November 7, 2011, I have calculated potential HAP emissions for the flocking line. The coating used currently contains 38% by weight of methyl isobutyl ketone (MIBK), so based on a five kilogram per hour use rate and a coating weight of 7.9 pounds per hour, the potential MIBK emissions are 4.2 pounds per hour or 18.41 tons per year. Thus, with the addition of this new line, the company's highest individual annual HAP potential facility-wide is now 18.41 tons, well above the 10 ton per year major source threshold for individual HAPs. Further, potential annual facility-wide HAP emissions are now at 29.57 tons, well above the 25 ton per hear threshold for total HAPs. Thus, as of March of 2011, Meteor Sealing Systems became a major source subject to Title V operating permit requirements.

In the permit application for EUs R004-R006 received on July 26, 2011, Meteor Sealing Systems requested a facility-wide restriction on individual HAP emissions to 9.9 tons per rolling, 12-month period. However, the application did not request a restriction on total facility-wide HAP emissions, and this restriction is also needed if the company wishes to be a synthetic minor source instead of a major Title V source. If Meteor Sealing Systems wishes to also restrict total HAP emissions from the facility, the company must submit a correction to Application No. A0042401 before processing of the FEPTIO for EUs R004-R006 can continue.

***(3) Facility profile issues.*** On July 7, 2011, DAPC, SEDO requested and obtained confirmation of the installation dates for the six emissions units covered in the corrected permit application submitted on June 3, 2011. Please be advised that the dates provided to you by the company's engineering manager did not match the dates listed in Meteor Sealing Systems' facility profile that was updated when the company submitted the corrected PTIO application. In that profile, the installation date for all six EUs was identified as September 1, 2006. However, based on the information provided on July 7, 2011, all of the booths (except for EU R003) were installed well before that date.

Pursuant to Ohio Revised Code (ORC) § 3704.05(H)(1), Meteor Sealing Systems must ensure the accuracy of the data submitted to Ohio EPA in the future to prevent the appearance that the data may have been falsified as a means to avoid regulation. Although the installation date for EU R002 was properly identified in the permit application that was created when the company submitted its application for PTIO #P0105045 in June of 2009, the incorrect date provided for EU R001 in both the profile and the application caused DAPC, SEDO to improperly establish Best Available Technology (BAT) requirements for EU R001 in PTIO #P0105045. This is because the BAT rules changed for sources installed after August 3, 2006, and sources installed after that date that emit less than 10 tons per year of any criteria pollutant are not subject to BAT requirements, while sources installed prior to that date are subject to BAT requirements if emitted at any rate in excess of de minimis levels. This same problem with improper application of BAT requirements would have occurred with EUs R004-R006 as well had the correct dates not been provided.

Should you have any questions concerning this letter or your application, please contact me at (740) 380-5245 or via email at kim.reinbold@epa.state.oh.us.

Sincerely,

Kimbra L. Reinbold
Division of Air Pollution Control
Southeast District Office

KLR/mlm

cc: Bruce Weinberg, DAPC, SEDO
Matt Ayer, Ayer Quality Engineering LLC