



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 30, 2011

Jefferson County
Christen & Laudon, L.P.
Facility ID # 0641175001
Inspection Correspondence
Warning Letter

Certified: 70101060000178962112

Thomas E. Haber
Christen & Laudon, L.P.
1768 Wildwood Road
Green Cove Springs, FL 32043

Dear Mr. Haber:

On March 25, 2011, I performed an inspection of the Christen & Laudon, L.P. facility located at the site owned by Walden Industries, Tiltonsville, Ohio. The inspection was conducted to determine the facility's compliance with State and federal air pollution rules and regulations.

While at the facility, I met with Jared Stensby, the site manager for the Christen & Laudon, LP. facility. During the visit, I reviewed records and performed a visual inspection of the facility. Accompanying this letter is a copy of Ohio EPA's Facility Inspection Forms. The emissions unit associated with the facility was not operating during the inspection.

Christen & Laudon, L.P. has one emissions unit, P001, which includes the temporary AEP FGD winding station consisting of two open molding processes; filament winding (FW) and non-atomized resin application (NARA). Permit-to-Install and Operate (PTIO) P0104413 was issued on August 12, 2009 for emissions unit P001. A copy of the permit is enclosed for reference.

Based on my inspection and file review, the following issue was discovered:

Emissions Unit P001: Reporting Requirements

Permit # P0104413 Section C.1.e)(2) requires that the permittee submit deviation reports to the Ohio EPA, Southeast District Office on a quarterly basis that identify the following:

- a) all deviations (excursions) of the emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential-to-emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit;

all exceedances of the rolling, 12-month emission limitation for VOC(s) and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);
- d) the magnitude and duration of each deviation (excursion);
- e) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC; and
- f) any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrated compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

To date, the company has submitted the Annual Permit Evaluation Report (PER) that was due February 15 and covered the previous January 1 through December 31 period, but Ohio EPA has not received quarterly deviation reports from Christen & Laudon, L.P. **Please submit all required quarterly deviation reports within thirty (30) days of receipt of this letter.**

Christen & Laudon L.P. has completed the AEP FGD winding and is in the process of moving the sections of duct to the AEP's Cardinal Plant in Jefferson County. Jared Stensby stated that by the end of April the temporary facility at the Walden Industries site will be permanently removed. Please remember to provide written confirmation to Ohio EPA stating when the facility is permanently shut down so the permit can be withdrawn.

Thomas E. Haber
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If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, please feel free to contact me at (740) 380-5253 or email laura.hughes@epa.state.oh.us. The assistance provided during the inspection was greatly appreciated.

Sincerely,



Laura Hughes
Environmental Specialist 2
Division of Air Pollution Control
Southeast District Office Ohio EPA

LS/mlm

Enclosures

cc: Jared Stensby, Site Manager
Bruce Weinberg, DAPC/SEDO