

Plastech  
0630 00 0007  
Correspondence



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

March 28, 2008

Re: Guernsey County  
Plastech Engineered Products Inc.  
Facility ID # 0630000007  
Non-HPV, Warning Letter  
Certified: 70063450000190560891

Patrick Kresnak  
Plastech Engineered Products Inc.  
110 N. 8th Street  
Byesville, OH 43723

Dear Mr. Kresnak:

On March 12, 2008, I performed an inspection of the Plastech Engineered Products, Inc. facility in Byesville, Ohio. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations. The Title V permit was issued on July 12, 2002 and expired on July 12, 2007. A renewal application was received on January 12, 2007 and is under review by this office. All terms and conditions contained in the Expired Title V must be followed and complied with. As of April 19, 2007, Plastech has also been subject to 40 CFR 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The MACT is not included in the current Title V permit, but the requirements were reviewed.

Based on my inspection, file review, and reports submitted by Plastech, the following violations were discovered:

**Violations:**

- (1) Title V Required Monitoring and Recordkeeping  
Part III., Section A.III.1. of the current Title V permit for emissions units R006, R007, R010 (Removed), R011, R012, R013, R014, R015, R016, R018, R019, and R021. Each unit has at least one of the following requirements.

**III. Monitoring and/or Record Keeping Requirements**

- f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

**And/Or**

- h. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all photochemically reactive cleanup materials, in pounds per day, and all non-photochemically reactive cleanup materials, in pounds per day;

- i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g+h), in pounds per day;
- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (i)/(e), in pounds per hour (average);
- k. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day;
- l. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all cleanup materials, in pounds per day;
- m. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., (g+l), in pounds per day; and
- n. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., (m)/(e), in pounds per hour (average).

During the inspection, it was noted that the cleanup material solvents contain acetone, heptane and other potential OC constituents are being used in the spray booths to purge lines and clean equipment but appeared to not be recorded as such or added into the total OC emissions calculation as pounds per day.

**(2) Testing Requirements**

**Part V, Section A.V.2. of the Title V permit for emissions units P007, R016, R018, R019, and R021**

The Permittee shall conduct, or have conducted, emissions testing for this/these emissions units in accordance with the following requirements:

- a. The emissions testing shall be conducted within 6 months **prior** to permit expiration, while emissions units P007, R016, R018, R019, and R021 are in operation.

The Title V expired July 12, 2007 and the emissions test was performed on August 16, 2007. Since the emissions test was after the expiration of the Title V permit, the deviation should have been indicated on the Annual Title V Compliance Certification Report.

**The Annual Title V Compliance Report for 2007 must be revised and resubmitted for evaluation and acceptance.**

Patrick Kresnak  
Plastech Engineered Products Inc.  
March 28, 2008  
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**MACT Questions and Answers:**

As of April 19, 2007, Plastech has been subject to 40 CFR 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. Plastech has chosen to comply with the MACT by selecting option b (*Emission rate without add-on controls option*) of section 63.4491 which requires the facility to keep a rolling 12 - month emission rate determined on a monthly basis and other requirements.

After reviewing the data spreadsheets for the affected emissions units, it was determined that the rolling tonnage figures in the spreadsheet were not changing on a monthly basis and that the system currently in place was not keeping track of the VOC or HAPs of the coatings or solvents used in the affected sources as cleanup material. Please correct.

Also, the record keeping and reporting requirements outlined in 40 CFR 63 Subpart PPPP, 40.4520 Semi-annual reporting requirements were not being met. Please refer to the MACT verbiage outlined and restructure the current Semi-annual reports to meet the MACT requirements. For example: 63.4520(a)(2)(iv) requires that the option, as outlined in 63.4491, used to comply with the MACT be identified in the compliance report which is not currently being done.

Within 30 days of your receipt of this letter, please submit to this office the information requested above. Plastech must provide Ohio EPA a compliance plan and schedule that outlines the steps that the company will take to ensure compliance with the applicable permit conditions and state and federal air pollution regulations as indicated above.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

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, feel free to contact me at (740) 380-5229 or email [russell.flagg@epa.state.oh.us](mailto:russell.flagg@epa.state.oh.us).

Sincerely,

  
Russell Flagg  
Environmental Specialist 2  
Division of Air Pollution Control  
Southeast District Office

RF/mlm

Enclosure

cc: Tom Kalman, DAPC/CO (w/o enclosure)  
Lisa Holcsher, USEPA (w/o enclosure)