



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

Re: Erie County
 0322020019
 Okamoto Sandusky Manufacturing
 Stack Test
Notice of Violation (NOV/HPV-GC8)

May 21, 2013

CERTIFIED MAIL

Mr. Robert Cristinzio, Plant Manager
 Okamoto Sandusky Manufacturing, LLC
 3130 West Monroe Street
 Sandusky, Ohio 44870

Dear Mr. Cristinzio:

This letter supersedes the letter dated May 1, 2013. It contains more accurate source operating rate data based on information supplied by the facility in a letter dated May 13, 2013.

The stack test conducted on March 5, 2013, on Ohio EPA emissions unit No. P029 (Expansion Line), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Critical Test Data
 (In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM ₁₀	0.242 lb/hr, 90.9% control efficiency	1.21 lbs/hr, 95% control efficiency	616 meters/hr	720 meters/hr
VOC	8.5 lbs/hr as propane, 19.5% control efficiency	1.21 lbs/hr, 95% control efficiency	616 meters/hr	720 meters/hr

The emissions unit was being operated in violation of its required fume eliminator control efficiency for both PM₁₀ and VOC [violation of Permit to Install (PTI) P0110842 issued December 3, 2012, term and condition C.2.(c)(1)(a) and Ohio Revised Code 3704.05].

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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In addition, the unit was being operated in violation of its allowable emissions rate for VOC [violation of PTI P0110842 issued December 3, 2012, term and condition C.2.(b)(1)(a), OAC rule 3745-31-05(D), and Ohio Revised Code 3704.05]. It will therefore be necessary to retest this unit or take other appropriate action to achieve compliance with the applicable emission limitation.

Based on actual VOC emissions reported from this testing event, the facility has a potential to emit of 37.23 tons VOC per year from P029. It should be noted that based on this recent testing, the facility's overall potential to emit for VOCs is now greater than 250 tons per year which qualifies the facility as a Prevention of Significant Deterioration (PSD) major facility.

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan which outlines a permitting strategy for the facility and schedule for further evaluation of the existing control equipment. The facility is required to submit this information by no later than **May 31, 2013**.

Please note that the submission of the requested information to respond to this letter 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. Ohio EPA will determine later whether to pursue such penalties in this case.

Also, be aware that the source was operating at 85.6% of its maximum source operating rate. The Ohio EPA will conditionally accept the test results for PM₁₀ if the company agrees to notify our office within 14 days of exceeding the 616 meters/hr operating rate by 10% or more. In addition, the company must agree to conduct a retest of the source within 45 days of exceeding the 10% threshold. Please send a written response within 14 days of this letter stating whether or not the company agrees to the conditional acceptance of the PM₁₀ test results.

Please feel free to contact me at (419) 373-3069 or Miranda.Garlock@epa.ohio.gov if you have any questions.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC, NWDO; DAPC, NWDO Stack File and Follow-up File
Certified Mail Receipt Number 70091410000118347028

ec: Mark Budge, DAPC, NWDO; Jay Liebrecht, DAPC, NWDO; Jennifer Jolliff, DAPC, NWDO; Andrea Moore, DAPC, NWDO; Robert Teer, DAPC, NWDO; Tom Sattler, DAPC, NWDO; Miranda Garlock, DAPC, NWDO; Bruce Weinberg, DAPC, NWDO; Brian Dickens, US EPA, Region V; Robert Cristinzio, Okamoto Sandusky Manufacturing, LLC; Gary Armstrong, Okamoto Sandusky Manufacturing, LLC and Robert Basl, EHS Technology Group, LLC