



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

CERTIFIED MAIL # 91 7108 2133 3932 1838 0389

May 24, 2013

Rick Dennis
HFI, LLC
59 Gender Road
Canal Winchester, OH 43110

Re: **Notice of Violation** based upon the May 16, 2013, notification to Ohio EPA

Dear Mr. Dennis:

This letter is in response to the notification sent by HFI, LLC consultant Tim McCarthy on May 16, 2013, regarding the operations and emissions from Adhesive Spray Booth 1 and 2 (K001 and K002 respectively).

Listed below are "Findings" based upon information provided in a notification to Ohio EPA by HFI, LLC consultant Tim McCarthy on May 16, 2013. The findings are followed by "Violation(s)" and "Requested Action(s)" necessary to address the stated findings and violations.

1. **Finding:** Emission limitation exceedence

During the April 18, 2013, full air compliance evaluation, HFI, LLC personnel informed Ohio EPA Central District Office (CDO) personnel Barbara Walker and Stephanie Habinak that production throughput for Adhesive Spray Booth 1 (K001) and Adhesive Spray Booth 2 (K002) had increased from 900 parts per day to 1,400 parts per day. Conversations between facility personnel and CDO personnel during the inspection noted that the increase in production was resulting in the facility rapidly nearing the combined emission limitation for the two emission units.

On May 16, 2013, HFI, LLC notified Ohio EPA Central District Office (CDO) inspector Barbara Walker of an exceedence of the volatile organic compound (VOC) rolling, 12-month emission limitation for emission units K001 and K002. Federally Enforceable Permit-to-Install and Operate (FEPTIO) P0111475 established a VOC emission limitation of 26.68 tons per rolling, 12-month period for K001 and K002 combined. For the 12-month period ending with April 2013, the emissions from the combined emissions units K001 and K002 was 28.9 tons.

Violation:

Operation of emission units K001 and K002 after exceeding the emission limitation established in Section C.4.b)(1)a. is a violation of the terms and conditions of FEPTIO P011475 which states:

"Volatile organic compound (VOC) emissions shall not exceed 26.68 tons per rolling, 12-month period."

Violation of the terms and conditions of FEPTIO P011475 is also considered a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

"No person who is the holder of a permit ...shall violate any of its terms or conditions."

Requested Action:

CDO requests that HFI, LLC submit a detailed compliance plan and schedule within thirty (30) days of receipt of this letter. The plan should include a detailed description of how the facility intends to demonstrate compliance with applicable permits and state and federal regulations, including specific dates and milestones that will be met during the return to compliance.

If HFI, LLC believes that an increase in the emission limitation is required, the compliance plan and schedule should include a date when a revised Synthetic Minor Title V permit application will be submitted to CDO. The application should include proposed synthetic minor operational restrictions that will sufficiently restrict facility emission levels below Title V thresholds. The application should include an updated facility-wide potential to emit for each pollutant.

If the facility determines that they do not wish to be limited by the operational restrictions necessary to adequately demonstrate that Title V thresholds cannot be exceeded, CDO requests that the facility submit a PTI application within sixty (60) days of receipt of this letter.

Additional Information

HFI, LLC is a Synthetic Minor Title V (SMTV) facility. All SMTV facilities are required to submit certain reports via the eBusiness Center: Air Services, which is accessed through the eBusiness Center. The eBusiness Center may be reached from the Ohio EPA home page at www.epa.state.oh.us or directly at ebiz.epa.ohio.gov.

Rick Dennis
HFI, LLC
Page -3-

Please note that Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If you have any questions, please contact Barbara Walker of my staff at (614) 728-3805 or barbara.walker@epa.ohio.gov.

Sincerely,



Bryon Marusek
Supervisor, Permits and Compliance
Ohio EPA, Central District Office
Division of Air Pollution Control

c: Kelly Toth, Manager, CDO/DAPC

e: Kelly Saavedra, CDO/DAPC
Barbara Walker, CDO/DAPC
John Paulian, CO/DAPC
Bryon Marusek, CDO/DAPC