



# REGIONAL AIR POLLUTION CONTROL AGENCY

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May 28, 2013

## Certified Mail

Ali Industries  
747 E. Xenia Dr.  
Fairborn, OH 45324

**RE: FY 2013 Full Compliance Inspection Follow Up  
Ali Industries  
Ohio EPA Identification Number 0829060557**

Dear Mr. Ali:

## WARNING LETTER

This letter is in regards to emission limitation and operational restriction exceedances identified through a compliance report during a site visit conducted by the Regional Air Pollution Control Agency (RAPCA) on March 12, 2013 at Ali Industries (Ali) and review of the annual report and Fee Emission Report (FER) submitted by Ali for calendar year 2012. The exceedances were documented for Ohio EPA air emissions unit (EU) P001. This letter also serves to address the failure to complete emissions testing for EU K003 in a timely manner.

The following table is a summary of the applicable permits for EUs P001 and K003 at Ali:

<b>Air Emissions Unit</b>	<b>Applicable Permit(s)</b>
P001- inline gluer machine for abrasive belts	PTI 08-04923 issued 4/8/08 PTO issued 05/21/08
K003- adhesive paper coating process with two roll coaters, a flexographic printer and drying ovens with permanent total enclosure and a regenerative thermal oxidizer	PTI 08-04850 issued 7/27/04 PTO issued 01/16/08

### **P001 Emission Limitation & Operational Restriction:**

Emissions Unit Term and Condition A.1. in PTI 08-04923 and the PTO for EU P001 state the organic compound (OC) emissions shall not exceed 9.33 tons/year, including cleanup. The 2012

FER submitted by Ali on January 8, 2013 indicated an annual emission rate of 9.375 tons. This emission rate is above the emission limitation of 9.33 tons/year cited in PTI 08-04923 and the PTO for EU P001. Furthermore, pursuant to Term and Condition B.1. of PTI 08-04293 and the PTO for EU P001 the maximum annual adhesive usage shall not exceed 2500 gallons per year based on a maximum adhesive volatile organic compound (VOC) content of 7 lbs/gallon. The 2012 annual report submitted on January 8, 2013 shows a usage rate of 2679 gallons/year. Furthermore, review of the material safety data sheet (MSDS) for the adhesive supplied by Worthen Industries does not support that the VOC content meets the limit of 7 lbs/gallon. In order to assess compliance with the requirements in PTI 08-04293 and the PTO for EU P001, additional information is necessary.

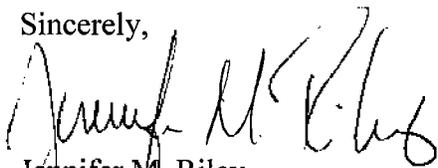
**K003 Emissions Test:**

Pursuant to Term and Condition E.3. of EU K003's PTO, Ali was required to conduct compliance demonstration testing on this emissions unit within 12 months prior to the permit expiration. The PTO expired on January 16, 2013 and an emissions test was not been conducted between January 15, 2012 and this date. The failure to perform a compliance demonstration on EU K003 within 12 months prior to the permit expiration date is a violation of the PTO for EU K003 and ORC 3704.05. In regard to EU K003's failure to complete timely testing, RAPCA acknowledges Ali plans to satisfy the testing requirement by conducting an emissions test on June 12, 2013 for EU K003.

This letter serves as official notification of the aforementioned testing requirement violation for K003. Regarding the uncertainty of compliance for EU P001, RAPCA requests that Ali provide an explanation clarifying the following: 1. Actual VOC/OC content of the adhesive, 2. Annual usage rate of adhesive in gallons for 2012, and 3. Annual OC emissions rate for 2012. Also, RAPCA would like to bring to Ali's attention the PTO for EU P001 expired on May 21, 2013. A renewal application was required to be submitted prior to this date and was not received by RAPCA. The information to explain the compliance status of EU P001 with PTI and PTO requirements along with a permit renewal application shall be submitted to RAPCA within thirty days of receipt of this letter.

RAPCA appreciates your cooperation and the prompt attention to these matters. If you should have any questions, please feel free to contact me at 937-225-4438.

Sincerely,



Jennifer M. Riley  
Air Pollution Control Specialist II  
Abatement Unit

Cc Brian Dickens, U.S. EPA (via e-mail)  
Bruce Weinberg, Ohio EPA (via e-mail)  
Jefferis Canan (via e-mail)