



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

April 24, 2013

CERTIFIED MAIL

Mr. Greg Foley  
Bucyrus Blades, Inc.  
260 East Beal Avenue  
Bucyrus, OH 44820

Re: Notice of Violation  
Facility ID: 0317010108  
Bucyrus Blades Inc.  
Location: 260 E. Beal Ave.,  
Bucyrus, OH 44820  
Crawford County

Dear Mr. Foley:

This letter shall serve as follow-up to Ohio EPA's review of the 2012 Annual Permit Evaluation Report (PER) for the Bucyrus Blades Inc. Crawford County facility, located at 260 East Beal Ave in Bucyrus, Ohio, received March 4, 2013. In this report, deviations from the monitoring and recordkeeping requirements of Permit to Install and Operate (PTIO) #P0108914, issued December 2, 2011, were noted for emissions units K001 (east down draft spray booth), R001 (east paint spray booth), and R002 (west down draft spray booth). It was also noted that the company has implemented several steps to correct the violations and return to compliance.

As a result of Ohio EPA's review of the PER report and the company's files, the following violations were discovered:

1. In PTIO #P0108914, term and condition C.1.b)(1)b. for emissions unit K001 states the rule-based emissions limitation of 3.5 lbs. volatile organic compounds (VOC)/gallon, from OAC rule 3745-21-09(U)(1)(d). The company's calculations and PER report show exceedances of this limitation for the months of January and February of 2012, due to incomplete recordkeeping. Also, the company has explained the process for obtaining the desired viscosity of the coating prior to application and an acceptable methodology is not being used to ensure compliance with OAC rule 3745-21-09(U)(1)(d) each time solvent is added to the coating prior to use (i.e. verification of compliant adds).

Each day where emissions unit K001 operated and the paint and solvent usage records were incomplete, and/or compliant solvent adds were not verified, is a violation of PTIO #P0108914, and Ohio Revised Code (ORC) 3704.05.

2. For emissions unit K001, the company reported that in 2012, the Bucyrus plant did not track cleanup materials usage for cleaning operations separately from the coating solvent usage. As a result, the VOC emissions from cleanup operations could not be calculated to show compliance with the 33.2 lb./month and 0.20 ton/year VOC limits for cleanup operations.

Each day where emissions unit K001 operated and the company did not track cleanup materials usage for cleaning operations separately from the coating solvent usage, is a violation of PTIO #P0108914, and Ohio Revised Code (ORC) 3704.05.

According to the information submitted by the company, the Bucyrus plant has put additional tracking methods into place to track cleanup materials usage and provided training to employees on proper usage tracking procedures, in order to correct the above violation.

3. For emissions unit K001, R001, and R002, periodic inspections of the paint booth filters were performed, however the Bucyrus plant did not keep records of those inspections for the 2012 reporting period.

Each day where emissions units K001, R001, and R002 were operated and records were not kept is a violation of PTIO #P0108914 and Ohio Revised Code (ORC) 3704.05.

According to the information submitted by the company, the Bucyrus plant has developed inspection forms and written procedures and provided employee training for documenting the inspections and maintenance on the dry particulate filters, in order to correct the above violation.

In order to bring the company into compliance with applicable state and federal regulations, the company must submit a compliance plan to explain how the company will correct the first violation and prevent that from occurring in the future. The company's written response to this letter is requested by May 21, 2012, and it should be submitted to my attention at the Ohio EPA, Northwest District Office. The second and third violations have been corrected, and the company has returned to compliance with respect to the tracking of clean-up material usage and documentation of dry particulate filter inspections.

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Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3113, or via e-mail at [peggy.argabright@epa.state.oh.us](mailto:peggy.argabright@epa.state.oh.us).

Sincerely,



Peggy Argabright  
Division of Air Pollution Control

/llr

Certified Mail Receipt Number 7009 1410 0001 1834 2313

cc: Bruce Weinberg, Central Office, Ohio EPA  
Brian Dickens, Region 5 U.S. EPA  
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