



REGIONAL AIR POLLUTION CONTROL AGENCY

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July 26, 2013

Certified Mail

David Bullard
Troy Laminating and Coatings, Inc.
421 S. Union Rd
Troy, OH 45373

**RE: FY 2013 Full Compliance Inspection Follow Up
Troy Laminating and Coatings, Inc
Ohio EPA Facility ID 0855140077**

Dear Mr. Bullard,

WARNING LETTER

This letter is in regards to emission limit, operational restriction, monitoring, record keeping and reporting violations identified during site inspections conducted by the Regional Air Pollution Control Agency (RAPCA) on March 18, 2013 and April 22, 2013 at Troy Laminating and Coating, Inc (TLC), located at 421 S. Union Road in Troy Ohio. This facility is identified by Ohio EPA Facility ID 0855140077. The violations were documented for Ohio EPA air emissions units (EUs) K004, K005, K007, K010, P002, P013, and P014.

A Title V Permit, P0092370, was issued for TLC on December 8, 2008 and expired on May 23, 2013. A timely renewal application was received on November 14, 2012 which allows TLC to continue to operate pursuant to Ohio Administrative Code (OAC) and Miami County Board of Health Local Air Pollution Control Regulations (MCBHLAPCR) rules 3745-77-08(E) and in accordance with the expired Title V permit. In addition to the Title V Permit, EU's K005, K007, K010 and P014 were issued Permits to Install (PTIs) that continue to be applicable to these emissions units. The following table is a summary of the applicable PTIs:

EU	PTI # and Date
K005	PTI 08-210 issued July 1, 1987
K007	PTI 08-01416 issued August 19, 1992
K010	PTI 08-04939 issued September 26, 2008
P013	PTI 08-03249 issued October 18, 1995
P014	PTI 08-04264 issued April 17, 2001

As identified in the Title V Permit P0092370, EUs K005 and K007 are required to have permanent total enclosures and vent volatile organic compound (VOC) and/or hazardous air pollutant (HAP) emissions to the ambient air or a thermal incinerator (TI). Furthermore, TLC is subject to several federal regulations, including:

- 40 CFR Part 63 Subpart JJJJ- National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating which limits the emissions of HAP from EUs K004, K005, K007, and K010 and includes various operating restrictions, monitoring, record keeping and reporting requirements; and
- 40 CFR Part 64- Compliance Assurance Monitoring (CAM) which requires monitoring of specific parameters for EU's K005 and K007 to ensure a reasonable assurance of compliance with VOC emission limits.

EU K007 Hourly Emission Limit

Pursuant to Title V Permit P0092370 Term and Condition C.4.b)(1)a. for EU K007 and the PTI 08-01416 the VOC emissions are limited to 72.2 lbs per hour. To verify compliance with this limit, daily records must be kept pursuant to Emission Unit Term and Condition C.4.d) of the Title V permit including the number of hours the emissions unit was in operation each day and the average hourly emission rate of VOC. While records maintained by TLC include the calculated average hourly emission rate of VOC each day, through record review RAPCA noted that the emission rates are based on 24-hr/day operation which is greater than the actual number of hours which TLC operates, thus underestimating the calculated hourly emission rate. Failure to keep accurate records of daily hours of operation for EU K007 is in violation of the Title V Permit P0092370, PTI 08-01416, and Ohio Revised Code (ORC) 3704.05.

EUs, P013, and P014 Daily Emission Limits

1) The Title V Permit P0092370, PTI 08-03249, and PTI 08-04264 limit daily emissions from EUs, P013, and P014. The following is a summary and of the organic compound (OC) limits:

EU	Permit Term and Condition(s)	OC Limit
P013	TV C.7.b)(1)a.	24 lbs/hr
P014	TV C.8.b)(1)a. PTI 08-04264 Part III. A.I.1.	42 lbs/hr

The monthly records received during the March 18, 2013 site visit, including October 2012 for EU P013, and September 2012 for EU P014, show emissions rates of greater than the above listed limits in violation of the Title V Permit P0092370, PTI 08-3249, PTI 08-04264, and ORC 3704.05.

2) The Title V Permit P0092370, PTI 08-03249, and PTI 08-04264 require specific record keeping for EU's P013, and P014 in order to verify emissions. The emission calculations require TLC to use TLC developed emission factors. Review of the records

maintained by TLC show that emissions factors are not being used when calculating emissions for these EU's.

3) The emission factor listed in the Title V permit P0092370 for EU P013 is 0.005 lbs OC/lbs coating mixed and has been previously identified by TLC as incorrect. In particular, TLC maintains that the units for the emission factor is incorrect stating that they should be lbs OC lost/lbs OC in the coating mixed. A renewal TV permit was received on November 14, 2012 which did not include a request to correct the Title V permit language to reflect the accurate units for the emission factor for EU P013.

K005 VOC Content Restrictions

1) Title V Permit P0092370 Term and Condition C.3.b)(1)b. for EU K005, PTI 08-210, and Ohio Administrative Code (OAC) rule 3745-21-09(F), the VOC content of coatings applied in EU K005 shall not exceed 2.9 lbs VOC/gallon coating excluding water and exempt solvents when the TI is not employed. Records show that on April 13, 2012, Coating C55122 with a VOC content of 3.58 lbs VOC/gallon coating without water was applied while EU K005 was vented to the ambient air in violation of the Title V Permit P0092370, PTI 08-210, OAC and MCBHLAPCR rules 3745-21-09(F), and ORC 3704.05.

2) Pursuant to Title V Permit P0092370 Term and Condition C.3.e)(1) for EU K005 and OAC rule 3745-21-09(B)(3)(g) must notify RAPCA in writing within 30 days after any daily record shows the VOC content of the coating applied in EU K005 exceeded 2.9 lbs VOC/gallon coating excluding water and exempt solvents, and include a copy of such record. No report has been received by RAPCA to date that identifies the above-noted VOC content limit deviation in violation of the Title V Permit P0092370, OAC and MCBHLAPCR rules 3745-21-09(B)(3)(g) and ORC 3704.05.

K004 & K010 40 CFR Part 63 Subpart KK

1) Title V Permit P0092370 Terms and Conditions B.4., C.2.b)(2)b. for EU K004 and C.5.b)(2)b. for EU K010, PTI 08-04939 Term and Condition C.1.b)(2)b., and 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry, state that EUs K004 and K010 are not affected sources subject to 40 CFR 63 Subpart KK as long as the requirements in 40 CFR Part 63 Subpart KK Section 63.821(a)(2)(ii)(A) are met. Specifically, Section 63.821(a)(2)(ii)(A) excludes these EUs if the materials applied by each press using product and packaging rotogravure and/or wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of materials applied by the press in that month. During the site visit at TLC on March 18, 2013, RAPCA requested records to assess compliance with this exemption from the rule; however, TLC was unable to provide them and in turn compliance is unknown.

2) Pursuant to Title V Permit P0092370 Terms and Conditions B.4., C. and Emissions

Unit Term and Condition C.2.d)(4) for EU K004 and C.5.d)(4), PTI 08-04939 Term and Condition C.1.d)(4), and 40 CFR Part 63 Subpart KK, Section 63.829(f), records must be kept as follows:

- a. The total mass of each material applied each month on the press, including all inboard and outboard stations; and
- b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

EUs K004 and K010 are also subject to OAC and MCBHLAPCR rules 3745-21-09(Y)(2)(b), which limit the combined usage of coatings and inks in the flexographic printing stations to 148 tons per year. The records required to be kept pursuant to 40 CFR Part 63 Subpart KK can be used to show compliance with this limit. These records were not available for review during the site visit on March 18, 2013; therefore, compliance with 40 CFR Part 63 Subpart KK and OAC and MCBHLAPCR rules 3745-21-09(Y)(2)(b) is unknown.

K005, K007, & P014 Control Requirements

1) As specified in Title V Permit P0092370 Terms and Conditions C.3.c)(1) for EU K005, C.4.c)(1) for EU K007, and C.8.c)(1) for EU P014 and 40 CFR Part 63 Subpart JJJJ, the average temperature in the combustion chamber of the TI in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. A stack test on the TI was performed on June 15, 2012, during normal operations, which demonstrated compliance with minimum destruction efficiency and overall control efficiency restrictions. The combustion chamber temperature was recorded by TLC every ten minutes during each of the three test runs and submitted to RAPCA with the performance test report. Based on RAPCA's analysis of the temperatures, the average combustion chamber temperature measured during the test was 1,502 °F. Records maintained by TLC contain multiple 3-hour average temperatures in the TI combustion chamber below the 1,502 °F limit established June 15, 2012, in violation of the Title V Permit P0092370, 40 CFR Part 63 Subpart JJJJ, and ORC 3704.05.

2) As specified in Title V Permit P0092370 Terms and Conditions C.3.d)(2) for EU K005, C.4.d)(3) for EU K007, and C.8.d)(1)&(2), a temperature monitor and recorder shall be installed, calibrated, and maintained in accordance manufacturer's recommendations. In addition, the following records shall be kept each day for the TI:

- a. All 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the TI was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and
- b. A log of the downtime for the capture (collection) system, TI, and/or monitoring equipment when the associated emission unit was in

operation.

Numerous temperature deviations were noted during the March 18, 2013 site visit and repeated incidents of monitor downtime, which TLC failed to record are in violation of the Title V Permit P0092370 and ORC 3704.05.

3) Pursuant to Title V Permit P0092370 Terms and Conditions C.3. e)(9) for EU K005, C.4.e)(9) for EU K007, and C.8.e)(1)a. for EU P014, quarterly reports must be submitted identifying deviations from the TI temperature limit, including the actual temperature(s) and any downtime of the capture (collection) system, TI, and/or monitoring equipment when an associated emission unit is in operation. RAPCA has identified numerous TI combustion chamber temperature limit deviations and monitoring equipment downtime incidents that have not been reported in violation of the Title V Permit P0092370 and ORC 3704.05.

K005 & K007 Continuous Parameter Monitoring System

1) Pursuant to Title V Permit P0092370 Terms and Conditions C.3.d)(4) for EU K005 and C.4.d)(5) for EU K007, and 40 CFR Part 63 Subpart JJJJ, Section 63.3350(e), TLC has the following requirements for the continuous parameter monitoring system (CPMS) used to monitor and record the thermal incinerator combustion chamber temperatures:

Requirement- 40 CFR Part 63 Subpart JJJJ Section 63.3350(e)(1)-(4),(6),(7),9(ii)
Record temperature at a minimum of once every successive 15-minute period
Collect valid data at least 90% of the hours during which the process operated
Determine hourly averages of all recorded readings, consisting of at least three to four equally spaced data values for that hour
Determine rolling 3-hour average of all recorded readings for each operating period (must use at least two of three hourly averages, only using valid data)
Maintain the monitoring system in proper working order including maintaining necessary parts for routine repairs of the monitoring equipment
Monitoring must be conducted at all times of operation except during monitoring malfunctions
Temperature monitoring device must be equipped with a continuous recorder

Evaluation of the records maintained by TLC revealed that temperature records do not meet the conditions listed above due to multiple failures of the continuous recorder and subsequent lack of records for the following dates and times (if known):

- April 28, 2012 thru May 2, 2012
- October 5, 2012 @ 6:02 pm thru October 9, 2012 @ 1:22 am
- October 12, 2012 @ 5:12 am thru October 17, 2012 @ 10:02 pm
- December 2, 2012 thru December 10, 2012 @ 12:35 am
- January 8, 2013 thru January 18, 2013

The failure to maintain and keep adequate records for the CPMS for the TI combustion chamber temperature is a violation of the Title V Permit P0092370, 40 CFR Part 63 Subpart JJJJ, Section 63.3350(e) and ORC 3704.05.

2) Pursuant to Title V Permit P0092370 Terms and Conditions C.3.d)(4)(i) for EU K005 and C.4.d)(5)(i) for EU K007, and 40 CFR Part 63 Subpart JJJJ, Section 63.3350(e)(9)(i), due to the use a TI to demonstrate compliance with the emission standards in Section 63.3320, TLC is required to install, calibrate, maintain and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or they must be replaced. Records supplied to RAPCA for review indicated that the temperature indicator (thermocouple) calibration is not consistently conducted every 3 months nor is the thermocouple replaced, in violation of the Title V Permit P0092370, 40 CFR Part 63 Subpart JJJJ, Section 63.3350(e)(9)(i) and ORC 3704.05.

3) Pursuant to Title V Permit P0092370 Terms and Conditions C.3.d)(4)h. for EU K005 and C.3.d)(5)h. for EU K007, and 40 CFR Part 63 Subpart JJJJ, Section 63.3350(e)(8), any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (RAPCA) in accordance with Section 63.3400(c) of 40 CFR Part 63 Subpart JJJJ. RAPCA has not received notification as required by the Title V Permit P0092370 and 40 CFR Part 63 Subpart JJJJ- Section 63.3400(c) except for the April and May 2012 deviation. As stated above, RAPCA noted additional deviations through record review on March 18, 2013 and these have not been reported in violation of the Title V Permit P0092370 and 40 CFR Part 63 Subpart JJJJ- Section 63.3400(c).

K005 & K007 Startup, Shutdown, and Malfunction Plan

Pursuant to the Title V Permit P0092370 Terms and Conditions C.3.d)(8) for EU K005, C.4.d)(9) for EU K007, and 40 CFR Part 63, Subpart A, Section 63.6(e), TLC is required to develop a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective actions for malfunctioning processes, air pollution control, and monitoring equipment used to comply with the relevant standards. TLC has developed a plan which identifies that if the TI combustion chamber falls below 1,460 °F, as a 3-hour average, EU's K005 and K007 will be shut down to prevent any deviations. As a new temperature deviation limit has been established as of June 15, 2012, the shutdown of EUs K005 and K007 at 1460 °F is no longer valid. Furthermore, the SSMP states that the TI is checked at least twice per shift by maintenance personnel; however, the continuous recording system failures were not identified.

K005 and K007 Compliance Assurance Monitoring

As specified in the Title V Permit P0092370 Terms and Conditions C.3.d)(9) for EU K005 and C.4.d)(10) for EU K007, and 40 CFR Part 64- Compliance Assurance Monitoring (CAM), TLC is subject to monitoring requirements for EUs K005 and K007 in

order to provide a reasonable assurance of compliance with the VOC emission limits for each. TLC has submitted a CAM plan which includes operational limits and monitoring procedures for static pressure on EUs K005 and K007 at the point emissions are captured and the combustion chamber temperature of the TI. Section 64.7(a)-(e) identifies the specifics for the following requirements:

- a. Commencement of operation- conduct monitoring required under 40 CFR Part 64
- b. Proper maintenance
- c. Continued operation
- d. Response to excursions or exceedances
- e. Documentation of need for improved monitoring

To date, TLC has experience multiple issues with the TI combustion chamber temperature record keeping system not promptly corrected, has performed testing of the TI which reestablished the temperature limit for the combustion chamber, has failed to notify RAPCA of the new temperature limit, and experienced numerous excursions (deviations) from the new TI temperature limit which have not been reported to RAPCA or corrected by TLC in violation of the Title V Permit P0092370, 40 CFR Part 63, Section 64.7(a)-(e), and ORC 3704.05.

Annual Title V Compliance Certification

As a Title V facility, TLC is required to submit an Annual Compliance Certification (ACC) pursuant to Title V P0092370 Term and Condition A.13.d) and OAC and MCBHLAPCR rules 3745-77-07(C)(5). The report is due by April 30th each year and shall cover the previous year of operation. Furthermore, the report must include the following:

- a) An identification of each term or condition of this permit that is the basis of the certification;
- b) The permittee's current compliance status;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
- e) Such other facts as the Director of the Ohio EPA may require in the permit to determine compliance status of the source.

On April 18, 2013, TLC submitted an ACC that was not complete based on the noncompliance issues noted above in violation of the Title V Permit P0092370, OAC and MCBHLAPCR rules 3745-77-07(C)(5), and ORC 3704.05.

Title V Semi-annual Reporting Requirements

As specified in Title V Permit P0092370 Term and Condition A.2.c)(3), TLC is required to submit semi-annual reports that identify any monitoring, record keeping, and reporting requirements that are not otherwise specified. As identified above, RAPCA has noted monitoring record keeping and reporting issues which TLC has failed to include in semi-annual reports in violation of the Title V Permit P0092370 and ORC

3704.05.

This letter serves as official notification of the aforementioned. In response to this letter, RAPCA requests the following actions of TLC:

1. Immediately begin tracking actual hours of operation each day and calculating average hourly VOC emission rates for EU K007. Submit one month of records.
2. Correct the emission calculations for EUs P013 and P014 by including the appropriate emission factors.
3. A revised TV application shall be submitted to request a change in the emission factor units for EU P013.
4. Review records from April 2012 to the present for EU K005 to identify any additional deviations from the VOC content limit of 2.9 lbs VOC/gallon coating minus water and exempt solvents. Furthermore, provide an explanation for the deviation noted on April 13, 2012 as well as corrective actions to prevent future deviations.
5. Submit the total ink and coating usage on the flexographic presses associated with EUs K004 and K010 for the calendar year 2012. Furthermore, ensure records are available for review during future inspections.
6. Records shall be submitted to show the monthly usage amounts of materials applied on the flexographic presses associated with EUs K004 and K010 and the total material usage on EUs K004 and K010, separately, for May 2012 through June 2013. In the future, records shall be kept as required.
7. TLC shall review the historical records for the TI dating from June 15, 2012 to June 30, 2013 to identify any deviations from the 3-hr average temperature limit of 1,502 °F when EUs K005, K007, and/or P014 were venting to the unit. A list of temperature deviations, including times, dates, and EUs venting to the TI, shall be submitted to RAPCA.
8. RAPCA requests that TLC develop a plan to ensure that the TI temperature is maintained at or above 1,502 °F, as a 3-hr average, on an ongoing basis. Furthermore, the plan shall include a means to quickly identify deviations of the TI temperature limit and submit timely deviation reports.
9. TLC shall review the historical records for the TI dating from April 2012 to June 30, 2013 to identify all times when the recording system (printer) for the TI combustion chamber temperature was not operational. The following information must be submitted to RAPCA:
 - a. Date of each failure to record TI combustion chamber temperature
 - b. Times for each failure to record TI combustion chamber temperature
 - c. Whether EUs K005 and/or K007 were venting to the TI during the failure
 - d. Total monthly operating time, in hours, for EUs K005 and K007, individually
10. Create a plan for the CPMS to verify all monitoring and/or recording issues are identified and corrected as soon as practicable and reported as required by the Title V Permit P0092370. The plan shall further identify procedures for conducting thermocouple calibrations or replacing them on a 3-month schedule along with corrective actions if the thermocouple does not calibrate properly.

11. As a reminder, TLC must notify RAPCA via the semi-annual report required by 40 CFR Part 63 Subpart JJJJ, Section 63.3400(c) for any averaging period for which you do not have valid monitoring data and such data are required.
12. The SSMP must be revised to address how TLC will identify start up, shutdown, and malfunction incidents. If the incidents will be avoided through the use of an interlock system, as in the past, the temperature limit set on the TI shall be reset and the plan revised to denote the new limit.
13. As part of the CAM requirements, TLC must revise the CAM Plan to reflect the new TI combustion chamber temperature established during the June 15, 2012 performance test.
14. Submit a revised 2012 ACC to identify all noncompliance issues, particularly those listed above.
15. Moving forward, TLC shall identify all deviations from monitoring, record keeping and reporting requirements as required by the Title V permit in their semi-annual reports.

RAPCA appreciates your prompt attention in the above matters. All items requested above shall be submitted within sixty days of receipt of this letter. Once RAPCA is in receipt of the requested information and records, we will be able to determine the compliance status of TLC. In addition, RAPCA acknowledges the complexity of the violations cited above as well as the volume of information requested; therefore, TLC shall contact RAPCA upon receipt of this letter to schedule a meeting. The meeting shall be scheduled for no later than September 6, 2013. If you have any questions, feel free to contact me at 937-225-4438.

Sincerely,



Jennifer M. Riley
Air Pollution Control Specialist

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