



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery, and Preble Counties
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July 15, 2013

Certified Mail

Jennifer Copeland
Steve Rauch, Inc.
1550 Soldier's Home -West Carrollton Rd.
Dayton, Ohio 45417

WARNING LETTER

Dear Ms. Copeland,

This letter is being sent in response to the recent relocation of portable sources without proper notification. Steve Rauch, Inc. (SRI) has various facilities containing emissions units (EUs) permitted through Ohio EPA. Two of those facilities are portable plants listed below:

- Portable Plant # 1, Facility ID: 0857045065
- Portable Plant # 2, Facility ID: 0857045066

Both portable plants #1 and #2 have permit requirements to be followed prior to the plants relocation;

The permittee is to provide a minimum of 30 days notice of the intent to relocate the portable source to the permitting authority (the Ohio EPA District Office or local air agency that has issued the effective current permit) prior to the scheduled relocation. The portable source can be relocated upon receipt of the Director's Notice of Site Approval for the site.

A Notice of Intent to Relocate a Portable Source (ITR) request was received by the Regional Air Pollution Control Agency (RAPCA) on March 21, 2013 regarding the proposed relocation of the SRI Facility ID 0857041905 emissions units F007, Eagle 1400 Crusher and B002, Cummins QSX -15 Generator to the site of the former Jeep Assembly Plant 1000 Jeep Parkway, in Toledo Ohio, 43610. Upon review of the ITR and subsequent follow-up with SRI, RAPCA found the March 21, 2013 ITR to be incomplete and incorrect. The ITR form submitted listed the wrong Facility ID, did not contain information as to the distance to the nearest dwelling, did not contain the expected start-up date and the expected completion date, and did not contain the complete equipment description.

SRI moved the portable plant to Toledo Ohio within 5 days of the March 21, 2013 ITR request, and began operation on March 28, 2013, in violation of the 30 day requirement of Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-31-03(A)(1)(p)(i)(c), and the EUs permit terms and conditions.

In addition, it was reported to RAPCA by the City of Toledo, Division of Environmental Services that the SRI portable plant location did not have a source of water to control dust and that the operator was unable to provide the City of Toledo any evidence of recordkeeping being kept on site as required by their permit.

This letter serves as official notification of the aforementioned relocation violation. RAPCA requests that SRI submit a compliance plan to address the premature relocation of the portable unit, the incomplete ITR submittal and a commitment to follow and maintain all recordkeeping and reporting requirements listed in facility permits. SRI's compliance plan and commitments shall be submitted within fourteen days of receipt of this letter.

If you have any questions or concerns you may contact me at (937) 225-5932, or by e-mail at oneillca@RAPCA.org.

Sincerely,

A handwritten signature in black ink that reads "Catherine A. O'Neill". The signature is written in a cursive style with a large, looping initial "C".

Catherine O'Neill
Air Pollution Control Specialist II
Abatement Unit

CC: Bruce Weinberg, Ohio EPA (via e-mail)
Brian Dickens, Ohio EPA (via e-mail)
Jefferis Canan, RAPCA (via e-mail)