



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

August 15, 2013

RE: NOTICE OF VIOLATION
CANFIELD COATING, LLC.
DAPC FACILITY ID: 0250030020

CERTIFIED MAIL

David J. Jacobson
Engineering and Environmental Manager
460 West Main St.
Canfield, Ohio 44406

Dear Mr. Jacobson:

Ohio EPA has reviewed the compliance stack test report for the Coil Coating Line (K001) submitted on August 14, 2013. The test was conducted on July 9, 2013 and witnessed by Matt Campbell and Zorica Dejanovic of the Northeast District Office (NEDO), Division of Air Pollution Control (DAPC).

The test was performed in conformance with the required testing protocols. The test report indicates that the Destruction Efficiency was 99.49% using sampling runs 1-3 and the Capture Efficiency was 86.04% using sampling runs 2-4, giving a final result of 85.60% overall capture. Pursuant to the State PTO P0085701 the required outcome was to be an overall control of 85.68%.

The results cannot be accepted as presented. The Destruction Efficiency and Capture efficiency have to be verified utilizing the same test runs. If run one were to be omitted overall, the numbers adjust accordingly. The Destruction efficiency drops to 98.5%, Capture efficiency is still 86.04% and the resulting Overall control drops to 84.76%. This limit is considerably lower than the required 85.68%.

The test failed to demonstrate compliance with the applicable rule and permit limitations. **Within twenty one (21) days of your receipt of this letter, please submit the following:**

- 1) An explanation as to the cause of the failure to comply with the allowable emission rate; and
- 2) A compliance plan and schedule to correct the problem that caused the failure. This discussion should include specific steps to be taken and a proposed re-test date.

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Operation of an air contaminant source in violation of the permitted allowable emission rate is a violation of Section 3704.05 (c) of the Ohio Revised Code, and the terms and conditions of the permit-to-operate and permit-to-install (PTIO).

The submission of the above information does not constitute a waiver of Ohio EPA's authority to seek civil penalties for this violation. Failure to submit a timely response may result in further enforcement action.

Also, the results of the testing are required to be submitted within 30 days of the testing event. Please ensure that the results are submitted within 30 days for future testing.

If you have any questions regarding this letter, please do not hesitate to contact me at (330) 963-1243.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Campbell', with a long horizontal line extending to the right.

Matt Campbell
Environmental Specialist II
Division of Air Pollution Control

MC:bo

pc: Jim Steudler, (THG)

ec: Zorica Dejanovic, NEDO-DAPC
Tim Fischer, NEDO-DAPC
Bruce Weinberg, CO-DAPC