

NON-HPV

**SOUTHWEST OHIO  
AIR QUALITY AGENCY**

August 28, 2013                      Certified Mail

Mr. Todd Harbour  
Metal Coaters  
2400 Yankee Road  
Middletown, OH 45044

Re: NOTICE OF VIOLATION -  
Facility ID: 1409000037, Emissions Unit K001  
Metal Coaters  
Location: 2400 Yankee Road,  
Middletown, OH 45044  
Butler County

Dear Mr. Harbour:

Metal Coaters submitted a Quarterly and Semi-Annual Deviation Report dated July 31, 2013 that revealed deviations from the requirements of Permit To Install P0110354 and 40 CFR Part 63 Subpart SSSS, National Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil.

Specifically, Permit To Install P0110354, issued 9/25/12, requires that Metal Coaters maintain continuous temperature monitors and recorders that measure and record the combustion temperature within each thermal oxidizer, the inlet temperature to the VOC concentrator desorption/reactivation zone, and the temperature of the exhaust gases immediately before the catalyst bed when the emissions unit is in operation, including periods of startup and shutdown. Metal Coaters reported that a paper circle chart recorder stopped recording the finish afterburner temperature after just one day of operation in the week beginning May 6, 2013 and again after just one day of operation in the week beginning May 13.

Failing to monitor and continuously record the temperature of the finish afterburner is a violation of the terms and conditions of PTI P0110354, 40 CFR Part 63 Subpart SSSS and ORC 3704.05(c).

These violations identified also constitute violations of City of Middletown Health Department rules. City of Middletown Health Department air pollution rules are enforced by the Southwest Ohio Air Quality Agency.

Metal Coaters identified in the Quarterly and Semi-Annual Compliance Certification a number of actions designed to ensure compliance with PTI P0110354 and subpart SSSS. These corrective actions are accepted as a plan to return to compliance and remain in compliance.

Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact me at 513-946-7752 or e-mail at [mike.ploetz@hamilton-co.org](mailto:mike.ploetz@hamilton-co.org).

Sincerely, 

Mike Ploetz  
Southwest Ohio Air Quality Agency

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

