



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

Crawford County  
Checkmate Marine, Inc.  
Premise # 0317010112  
Title V Inspection  
**Notice of Violation**

September 26, 2013

Mr. Dean Reynolds, General Manager  
Checkmate Marine, Inc.  
3691 State Route 4  
P.O. Box 351  
Bucyrus, Ohio 44820-0351

Dear Mr. Reynolds:

This letter shall serve as a follow-up to the inspection conducted on September 11, 2013, of the above referenced facility by myself and Mr. Chad Winebrenner, of this office. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, my observations during the inspection and a review of the company's files, my findings are as follows:

1. Emissions units R001 and R003 through R013: In accordance with the company's Title V renewal permit P0107099, effective March 31, 2011 and 40 CFR 63.5770(a), "Your records must be readily available and in a form so they can be easily inspected and reviewed." In accordance with 40 CFR 63.5770(c), "You must keep each record on site for at least 2 years after the date that each record is generated." At the time of our inspection, no records were available on site for our review. Records that should have been on site for our review include the following:
  - a. 40 CFR 63.5704(a)(3) or (b)(3) – records showing compliance with the open molding emission limit, either by using the emissions averaging option or the compliant materials option; and
  - b. 40 CFR 63.5707(d) – the implementation plan for all open molding operations that use the emissions averaging option to show compliance with the open molding emission limit.

Failure to keep these records on site and provide them during an inspection is a violation of 40 CFR 63.5770, the company's Title V renewal permit P0107099, and Ohio Revised Code (ORC) 3704.05.

2. Emissions unit R001: In accordance with the company's Title V renewal permit, terms and conditions 1.d)(2) through (6), the permittee is required to conduct inspections of the dry particulate filter to ensure proper operation, and document and maintain records concerning the inspection of the dry particulate filter. These records of the inspection of the dry particulate filter shall be maintained at the facility and shall be made available upon request. At the time of our inspection, no records were available on site for our review, and a subsequent e-mail from the company's consultant, Mr. John Berent, indicates that records of the inspections of the dry particulate filter have not been kept.

Failure to maintain these records, keep them on site, and provide them during an inspection is a violation of the company's Title V renewal permit P0107099, and Ohio Revised Code (ORC) 3704.05.

3. Emissions units R001 and R003 through R013: In accordance with the company's Title V renewal permit P0107099, effective March 31, 2011, and/or 40 CFR 63.5764, second quarter and semi-annual reports have not been submitted for 2013.

Failure to submit these reports is a violation of 40 CFR 63.5764, the company's Title V renewal permit P0107099, and Ohio Revised Code (ORC) 3704.05.

It was noted during the inspection that a change of ownership has occurred, though no written information has been provided to Ohio EPA as of the date of this letter. In accordance with the Title V renewal permit, Standard Terms and Conditions (A.28.), "Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio Environmental Protection Agency must be notified in writing of any transfer of this permit." According to the Ohio EPA "Guidelines for Transfer of Ownership Notification," which was given to you at the time of the inspection, transfer of ownership notifications should be completed within 30 days of the ownership transfer date. Therefore, this notification should be completed as soon as possible.

Ohio EPA requests that Checkmate Marine submit a written response to this letter by October 28, 2013. The response shall include a compliance plan for resolution of the violations cited above and the following information:

1. Completed transfer of ownership notification;
2. Request for Administrative Permit Amendment (APA) modification to the Title V renewal permit, to reflect the new ownership;
3. Copies of records that should have been on site for review during the inspection (items 1. and 2. above);
4. A plan for keeping records concerning the inspection of the dry particulate filter and a statement that the record of the inspections will be kept on site as specified in the Title V permit; and
5. Submittal of the second quarter and semi-annual reports for 2013.

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Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the 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.

I would like to thank you for the courtesy extended during our visit. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3113 or electronically at [peggy.argabright@epa.state.oh.us](mailto:peggy.argabright@epa.state.oh.us).

Sincerely,



Peggy Argabright  
Division of Air Pollution Control

/cg

pc: NWDO DAPC Inspection file

ec: Jennifer Jolliff, NWDO, DAPC  
Peggy Argabright, NWDO, DAPC  
Chad Winebrenner, NWDO, DAPC  
Mark Budge, NWDO, DAPC  
Bruce Weinberg, CO  
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John Berent, consultant