



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

RE: Richland County  
Jay Plastics, Inc.  
Premise # 0370010058  
**Notice of Violation (NOV/nonHPV)**

September 20, 2013

CERTIFIED MAIL

Mr. Allen Wheeler  
Jay Plastics, Inc  
150 East Longview Avenue  
Mansfield, Ohio 44903

Dear Mr. Wheeler:

This letter shall serve as a follow-up to the inspection conducted on September 6, 2013 of the above referenced facility by Chad Winebrenner and Debbie Ko of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. Generator #2 (P005) at Jay Plastics, Inc is a natural gas-fired, 4 stroke rich burn, spark ignited reciprocating internal combustion engine (RICE) which is used for peak shaving operations at the facility. The engine was reconstructed on October 25, 2007 making it subject to the requirements found in 40 CFR Part 60, Subpart JJJJ. Specifically, 40 CFR Part 60.4243(i)(2) requires testing after reconstruction to demonstrate initial compliance with the emissions standards. This test is required within 60 days after the engine commences operation after the modification or reconstruction. In addition, the facility was required under 40 CFR Part 60.4243(a)(2)(iii) to conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. Jay Plastics, Inc. has failed to conduct both the initial compliance testing and the subsequent testing for P005. This is a violation of ORC 3704.02 and 40 CFR Part 60.4243(i)(2) and 40 CFR Part 60.(a)(2)(iii).

In order to correct this violation, P005 will need to be tested according to the testing requirements found in 40 CFR Part 60.4244 or the unit will need to be shut down prior to the testing date listed in Permit to Install (PTI) #P0115083 which was issued draft on August 15, 2013.

2. Additionally, Jay Plastics Inc. shut down emissions unit P007 which was listed as a 5.822 mmBtu/hr, 4 stroke rich burn natural gas fired generator, on July 1, 2007 and replaced it with another generator (P008) without first applying for and obtaining a PTI. This is a violation of ORC 3704.02 and OAC rule 3745-31-02.

Jay Plastics, Inc has since applied for a PTI for P008 which was issued draft on August 15, 2013.

3. After reviewing records it was noted that the facility is not keeping a rolling 12-month summation of the VOC and HAP limits for each coating unit (K001, R003 through R016, R101 through R103, R105, and R108 through R112). Instead, the facility is currently keeping records on a quarterly rolling basis, summed up on a rolling basis only before each deviation report is due. Jay Plastics will need to change the recordkeeping procedures and format to show each emission unit's current monthly rolling total.
4. The cleanup material butyl acetate is used primarily at the facility to clean the spray guns and to be mixed with the coating for thinning purposes. The recordkeeping did not show the amount of butyl acetate being used. As it was explained during the inspection, a certain amount of butyl acetate is drawn from a tank through a nozzle where it either is combined with the coating or other times is solely used to spray through the spray gun for cleanup purposes. As was stated during the inspection, the butyl acetate is counted towards the VOC emissions but no records clearly identify the amount of cleanup and thinning material used in the process. The butyl acetate material will need to be counted and calculated individually and added to the total VOC emissions rate.
5. Each paint booth operates a water wash system and/or a particulate filter for control. The paint booths K001, R014, R015 and R016 have a requirement that Jay Plastics Inc. must document annual and periodic inspections of the water wash and/or dry filter systems for these units. During the inspection it was noted that the facility changes out the dry filters on a daily basis but there was no documentation of any inspections on the water wash system/dry filter. Jay Plastics Inc. will need to start keeping records of any inspections, maintenance or repairs performed on these control systems with a minimum requirement of one annual inspection on the water wash/dry filter system for these units.
6. R015 and R016 were listed as not installed in STARs2. Please change these units in Air Services to operating.
7. As a reminder, Jay Plastics Inc. will need to complete emissions testing by October 19, 2013 in accordance with the requirements listed in 40 CFR Part 63 Subpart ZZZZ and 40 CFR Part 60 Subpart JJJJ for each applicable generator unit (P004, P005 and P008).
8. Jay Plastics Inc. currently has several permits in draft stage as of this date. The Title V renewal permit went into the Preliminary Proposed Permit stage on January 19, 2013. Ohio EPA-NWDO received public comments from Jay Plastics Inc. at that time about incorrect specifications and rule applicability for the generator units. In addressing these changes Ohio EPA-NWDO issued several draft permits. P0115084 contains P008 (Generator #3) and P0115083 contains P004 and P005 (Generator #1, #2). Both of these draft permits will be coming off public comment on September 17, 2013.

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The changes made on the recent draft permits will reflect the needed changes for the generators and a corrected/revision to the Title V application will need to be submitted to incorporate the changes into the renewal Title V. Please submit this corrected application before September 17, 2013.

Ohio EPA requests Jay Plastics Inc. submit a compliance plan and schedule for the information listed in items #1, #3, #4 and #5. The compliance plan and information requested should be submitted to Ohio EPA – NWDO no later than October 21, 2013.

Please be advised that submission of 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 a decision whether to pursue such penalties regarding this matter a later date. If you have any questions, please contact me at 419-373-3121 or E-mail [Chad.Winebrenner@epa.state.oh.us](mailto:Chad.Winebrenner@epa.state.oh.us)

Sincerely,



Chad Winebrenner  
Division of Air Pollution Control

/cg

pc: Certified Mail Receipt Number 7011350000082042067

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