



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

Re: Williams County
Sauder Manufacturing Company Stryker
Premise # 0386000042
Notice of Violation (NOV) – non HPV

June 6, 2013

CERTIFIED MAIL

Mr. Nathan Baer, Engineering Manager
Sauder Manufacturing Company
201 Horton Street
Stryker, Ohio 43557

Dear Mr. Baer:

This letter shall serve as follow-up to the inspection conducted on May 22, 2013 of the facility addressed above (Sauder) by this writer, Mr. Chad Winebrenner, Mr. Luke Stoll and Ms. Emily Stewart, all representing Ohio EPA's Division of Air Pollution Control (DAPC). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. Regarding the foam adhesive application booth (R005), Title V (TV) Permit #P0087768, issued on June 1, 2009, term C.2.c)(2) requires that "The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations... The dry particulate filter shall be employed during all periods of coating application to control particulate emissions." While on site, the exhaust system for R005 was not being used, therefore, the dry filter, while in place and present, is not considered employed or "in service". Failure to employ the dry particulate filter while operating R005 is a violation of term C.2.c)(2) of TV Permit #P0087768 and Ohio Revised Code (ORC) 3704.05. To remedy this situation Sauder must immediately begin to employ the dry particulate filter system and continue to comply with term C.2.c)(2) of TV Permit #P0087768.
2. Regarding R005, term C.2.d)(6) of TV Permit #P0087768 requires that Sauder "maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation". Sauder has kept no such records.

It was determined that the exhaust fan has not been regularly employed, and may not have been employed at all, since approximately May, 2012. Failure to document times when the dry particulate filter was not employed while R005 was operating is a violation of term C.2.d)(6) of TV Permit #P0087768 and ORC 3704.05. To remedy this situation Sauder must begin to accurately record any time when R005 is being used and the dry particulate filter is not being employed.

3. Regarding R005, term C.2.e)(2) of TV Permit #P0087768 requires that Sauder submit quarterly deviation reports "that identify any daily record showing that the dry particulate filter was not in service (normal operation) when the emissions unit was in operation." If there were no deviations of this requirement then the quarterly report must make a negative declaration, clearly stating that no deviation has occurred. A review of the quarterly deviation reports through the second quarter of 2012 all indicate negative declarations of all emissions units at the facility through that period, which cannot be accurate given items one and two above. Failure to accurately report these deviations is a violation of term C.2.e)(2) of TV Permit #P0087768 and ORC 3704.05. To remedy this situation a report must be submitted to this office via the eBusiness website amending all the previously submitted incorrect reports. Also, any TV Compliance Certifications submitted during the affected time period must be amended and resubmitted to accurately reflect these deviations and violations.
4. Three additional foam adhesive application stations have been installed at the facility, in February 2007, October 2010 and August 2011, respectively. All three stations employ the same foam adhesive used in R005, are applied using the same type of conventional air spray guns and are all supplied from the same single source and truncated supply line. The installation of each station constitutes the installation of a new emissions unit at the facility. The installing and operating each emissions unit prior to obtaining a PTIO constitutes a separate violation of both OAC rule 3745-31-02 and ORC 3704.05. To remedy this situation the company must obtain PTIOs for these emissions units.
5. Regarding the three additional adhesive application stations, as the operations are currently installed, OAC rule 3745-17-11(C) is an applicable rule and, therefore, requires the use of a dry particulate filter, waterwash or equivalent control device or devices. The company currently does not employ any such control device or devices at any of the stations and has not had an alternate control method approved by this office.

Mr. Nathan Baer
June 6, 2013
Page 3

Failure to employ proper control devices at each of these emissions units constitutes a violation of OAC rule 3745-17-11(C) and ORC 3704.05. To remedy this situation the company must either identify an applicable exemption to the rule or install and employ a dry particulate filter, waterwash or equivalent control device or devices.

The company's written response to this letter is requested by July 9, 2013. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the adhesive station dry filtration issues and a timeline for submitting all required applications and revised reports.

Please note that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3137, or via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/cg

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