



**Environmental
Protection Agency**

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

Re: Richland County
Kronis Coatings
Premise # 03.70.01.0179
Notice of Violation (NOV)

October 19, 2011

CERTIFIED MAIL

Mr. Allen Wheeler, EH&S Director
Kronis Coatings
1575 West Longview Avenue
Mansfield, Ohio 44906

Dear Mr. Wheeler:

This letter shall serve as follow-up to the inspection conducted on September 27, 2011, of Kronis Coatings (Kronis), located at 1575 West Longview Avenue in Mansfield, Ohio, by this writer. Recent attempts to process Ohio Permit to Install and Operate (PTIO) applications revealed some conflicting information regarding what units were on site and in operation at this time. The purpose of this inspection was to identify and determine the compliance status of all air contaminant emissions units subject to regulation by the Division of Air Pollution Control (DAPC) located at the facility.

Based on my discussions, my observations during the inspection and a review of the company's files, my findings are discussed below.

1. Kronis operates two aqueous solution parts washing systems which both vent to the exterior atmosphere. One is a line consisting of multiple vertical tanks which use various acidic, caustic and clean rinse stations to clean parts. The other is a horizontal mesh belt line which conveys parts through multiple spray wash stations. Neither of these units are subject to DAPC regulation.
2. Kronis operates a natural gas fired fluidized bed parts cleaning system which is identified as P001. Kronis began installation in April of 1995 and began operation in October of 1995. Ohio Permit-to-Install (PTI) 03-9296 was issued final on November 8, 1995, for this unit and it was put on Registration Status on August 10, 2001. The PTI application for this unit describes the unit at 0.62 MM Btu/hr, however, recent inquiry shows the unit can operate at a rating as high as 0.99 MM Btu/hr. Because of the range of operational output, this unit may require a permit modification.

3. Kronis operates a 2.75MM Btu natural gas fired parts drying oven which is exempt, per Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(c).
4. Kronis operates a total of three powder coating lines which all vent inside the building after employing dry filtration; one unit is a manual application only station and the other two units use both automated and manual application stations. These units are not subject to DAPC regulation because they do not exhaust to the external atmosphere and there are no fugitive emissions.
5. Kronis operates a powder coating cure oven which uses two heating units, rated at 2.75 MM Btu/hr each. Using AP-42 emissions factors for the natural gas combustion and manufacturer's data for the powder coating operations, this unit has been determined to be meet the "de minimis" exemption in OAC rule 3745-15-05(B). However, emissions from this unit may still need to be considered for facility wide potential and actual emissions, as described later in this letter.
6. Kronis operates four (4) natural gas fired electrical co-generation units to supplement power during peak electric usage times throughout the year. Information on each unit is listed below:
 - a) Co-Generator #1, P002, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in April of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection.
 - b) Co-Generator #2, P003, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in April of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection
 - c) Co-Generator #3, P004, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in May of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection
 - d) Co-Generator #4 was installed in July of 2007. This unit was not permitted prior to installation and remains unpermitted. We were unable to confirm the heat rating, in Btus, at the time of the inspection

Failure to obtain a PTI prior to installation and/or operation of co-generator #4 is a violation of OAC rule 3745-31-02(A) and Ohio Revised Code (ORC) 3704.05. To remedy this situation the company must submit a complete PTIO application to this office for the emissions unit in question, in conjunction with the directions identified later in this letter.

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7. Kronis operates two (2) natural gas fired boilers, each rated at 4.5 MM Btu/hr, Both were installed in April of 2000 and are exempt per OAC rule 3745-31-03(A)(1)(a).
8. According to Ohio EPA's records, there was also an emission unit identified as N001 which was listed as a burn off oven, used to remove powder coatings. PTI #03-9927 was issued on October 17, 1996 for this unit. This was overlooked at the time of the inspection and, Ohio EPA needs to confirm the unit is still on site and in operation. Please indicate in your response to this NOV whether the unit is still in operation.

An initial review of the facility's permits and emissions limits prior to inspection show that, with the installation of co-generator #4, Kronis may have exceeded Title V emissions thresholds based on their potential to emit (PTE). However, as we discussed during the inspection, Kronis does not operate the co-generators at their full capacity, typically limiting their operation to only a few hundred operational hours per year. This will impact Kronis' Title V applicability and may result in Kronis qualifying for a synthetic minor federally enforceable state operating permit (FESOP). To accurately make that determination Ohio EPA is requesting that Kronis submit facility wide PTE calculations and facility wide actual emissions calculations for all regulated emissions units on site. This would include all emissions units previously identified as exempted by rule and those that are believed to be "de minimis". All regulated pollutants must be examined as this will help determine if the facility qualifies for the FESOP permit.

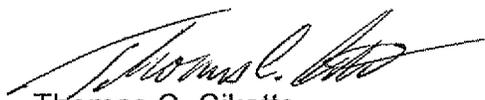
Once a determination is made as to which units require permitting or possible modifications, Ohio EPA will advise Kronis how to proceed with the permit application process. The company's written response to this letter is requested no later than November 25, 2011. It should be submitted to Ohio EPA, Northwest District Office and contain the above referenced calculations and a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future.

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

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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

/lr

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