

**HAMILTON COUNTY  
ENVIRONMENTAL  
SERVICES**

1/13/2012

Certified Mail

Craig Barnhill  
Alba Manufacturing, Inc.  
8950 Seward Road  
Fairfield, OH 45011

Re: NOTICE OF VIOLATION – USE OF NON-COMPLIANT COATINGS  
Facility ID: 1409001107  
Alba Manufacturing, Inc.  
Location: 8950 Seward Road,  
Fairfield, OH 45011  
Butler County

Dear Craig Barnhill:

On December 28, 2011, Hamilton County Department of Environmental Services (HCDOES) received a notification report for the months of October 2011 and November 2011 indicating that emissions unit K001, a paint spray booth for miscellaneous metal parts, at Alba Manufacturing (Alba) had utilized non-compliant coatings. Specifically, Alba provided daily records indicating the use of non-compliant coatings on October 12, 14, 20, 24, 26, 27, 28, and 29, 2011, and November 16 and 22, 2011. The volatile organic compound (VOC) content of the two non-compliant coatings utilized on these dates was reported as 3.86 pounds of VOC per gallon and 4.88 pounds of VOC per gallon.

In accordance with Ohio Administrative Code (OAC) rule 3745-21-09(U)(1) and the Permit to Install and Operate (PTIO) P0108742 issued 10/11/2011 for emissions unit K001, coatings shall not exceed 3.5 pounds of VOC per gallon of coating. Additionally, OAC rule 3745-21-09(B)(3)(g) and PTIO P0108742 requires that the permittee submit a notification regarding the use of any non-compliant coatings within 30 days following the end of the calendar month in which such coatings were employed.

The use of non-compliant coatings and the delay in reporting the use of non-compliant coatings is a violation of the terms and conditions of the PTIO and OAC rule 3745-21-09. The violations identified also constitute a violation of Butler County Health Department rules. Butler County Health Department air pollution rules are enforced by HCDOES.

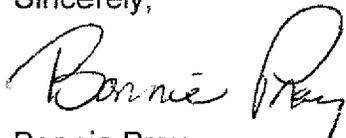
Since the notification included the corrective actions taken and indicated that the emissions unit has returned to compliance with the VOC content limitations, a plan and schedule for achieving compliance is not required in response to this Notice of Violation.

Craig Barnhill  
Alba Manufacturing, Inc.  
1/13/2012  
Page 2

Acceptance by the Ohio EPA of the corrective actions taken by Alba Manufacturing 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 513-946-7739 or E-mail [bonnie.pray@hamilton-co.org](mailto:bonnie.pray@hamilton-co.org).

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Pray". The signature is written in black ink and is positioned to the left of the typed name.

Bonnie Pray  
Hamilton County Department of Environmental Services

cc: Tom Kalman, Central Office, Ohio EPA  
William MacDowell, Region 5 U.S. EPA