



Environmental
Protection Agency

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

CERTIFIED MAIL # 91 7108 2133 3932 4449 1769

March 18, 2011

Union County
Precision Coating Systems, Inc.
OEPA ID: 0180010167
Air Compliance Inspection

Wendy Myers
President
Quantum Technologies and Services
948 Columbus Avenue
Marysville, OH 43040

**Re: Notice of Violation
2011 Compliance Inspection**

Dear Ms. Myers:

On March 2, 2011, Ohio EPA Central District Office (CDO) met with you for the purpose of conducting a Full Compliance Evaluation (FCE) of Precision Coating Systems, Inc. (PCS), in Marysville, Ohio. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations.

A review of the following emissions units comprised the compliance evaluation of your facility:

K001 – Downdraft Booth #1
K002 – Downdraft Booth #2
K003 – Booth #3
K004 – Booth #4
K006 – Booth #6
P001 – Mixing Room

A synthetic minor permit to install (P0104133) was issued to PCS on December 11, 2008. This permit contains terms and conditions for emissions units K001, K002, K003, K004 and P001. A federally enforceable permit to install and operate (P0103659) was issued to PCS on January 21, 2009. This permit contains terms and conditions for the emissions unit K006.

Compliance was assessed based upon an examination of each emissions unit at the facility, an examination of monitoring and record keeping files maintained at the facility, and a review of compliance reports and fee emissions reports maintained at CDO. Below is a summary of the inspection findings, violations and action items that need to be addressed.

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50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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www.epa.ohio.gov

Finding 1

During the inspection all permitted sources, which were in operation, appeared to be in good working condition. All paint arrestor filters were in place and appeared new. The emissions units in operation, during this inspection, are as follows: K003, K004, K006 and P001.

Requested Action

PCS should continue to operate these emissions units in compliance with applicable permit terms and conditions.

Finding 2

During the review of records maintained at the facility, CDO staff observed that PCS was not keeping filter maintenance records for emissions units K001, K002, K003, K004 and K006 pursuant to the following sections of their permits.

Permit	Emissions Unit	Section
P0104133	K001	C.1.d)(9)
P0104133	K002	C.2.d)(9)
P0104133	K003	C.3.d)(9)
P0104133	K004	C.4.d)(9)
P0103659	K006	C.1.d)(4)

These sections of the permits state:

The Permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;*
- b. a description of each/any problem identified and the date it was corrected;*
- c. a description of any maintenance and repairs performed; and*
- d. the name of the person who performed the inspection.*

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

Violation

Failure to document and maintain filter maintenance records for emissions units K001, K002, K003, K004 and K006 is a violation of the terms and conditions of P0104133 and P0103659. Violations of the terms and conditions of an effective permit are also considered a violation of Ohio Revised Code (ORC) 3704.05(C), which states:

"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Requested Action

During the March 2, 2011 inspection, PCS verbally committed to begin keeping filter maintenance records for these emissions units. Ohio EPA requests that PCS submit written notification to CDO, Division of Air Pollution Control when this change has been implemented, no later than 30 days of receipt of this letter.

Finding 3

During the review of records maintained at the facility, CDO staff observed that PCS was not maintaining individual HAP emissions records pursuant to the sections of their permits listed below. Following the inspection, CDO staff contacted PCS's consultant, Tim McCarthy, who confirmed that records of PCS's individual HAP emissions have not been maintained.

Permit	Emissions Unit	Section
P0104133	K001	C.1.d)(4)
P0104133	K002	C.2.d)(4)
P0104133	K003	C.3.d)(4)
P0104133	K004	C.4.d)(4)
P0104133	P001	C.5.d)(4)
P0103659	K006	C.1.d)(9)

These sections are needed to demonstrate compliance with the synthetic minor limitations established in PCS's permits and state:

The permittee shall collect and record the following information each month for K001-K004, K006 and P001:

- a. *The name and identification number of each coating employed, thinner, and cleanup material employed.*
- b. *The total volume, in gallons, of each coating, thinner, and cleanup material employed.*
- c. *The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.*

- d. *The total HAP emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.*
- e. *The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in pounds or tons.*
- f. *The rolling, 12-month summations of the data required in each of the items d. and e. above.*

Violation

Failure to collect and record individual HAP emissions for K001-K004, K006 and P001 is a violation of the terms and conditions of P0104133 and P0103659. Violations of the terms and conditions of an effective permit are also considered violations ORC 3704.05(C).

Requested Action

CDO staff discussed these recordkeeping requirements with PCS's consultant. Mr. McCarthy has committed to begin maintaining PCS's individual HAP emissions records. After one month of tracking individual HAP emissions, Ohio EPA requests that PCS submit a copy of these records to CDO, Division of Air Pollution Control, no later than 30 days of receipt of this letter.

Finding 4

A review of CDO's records established that compliance reports were not submitted in accordance with the following sections of PCS's permits.

Permit	Emissions Unit	Section(s)	Report(s)
P0104133	K001	A.4.c) and C.1.e)	Quarterly, Semi-Annual, Annual
P0104133	K002	A.4.c) and C.2.e)	Quarterly, Semi-Annual, Annual
P0104133	K003	A.4.c) and C.3.e)	Quarterly, Semi-Annual, Annual
P0104133	K004	A.4.c) and C.4.e)	Quarterly, Semi-Annual, Annual
P0104133	P001	A.4.c) and C.5.e)	Quarterly, Semi-Annual, Annual
P0103659	K006	C.1.e)	Quarterly, Permit Evaluation Report

The quarterly reports required for all emissions units have been submitted late and reference a superseded permit as well as a shutdown unit.

The semi-annual and annual reports required for emissions units K001, K002, K003, K004 and P001 have not been submitted.

The 2010 Permit Evaluation Report (PER) for K006 that was due on February 15, 2011 was not submitted.

Wendy Myers
Precision Coating Systems, Inc.
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On March 2, 2011, Pam McCoy of my staff e-mailed to you a compilation of the late and missing reports.

Violation

Failure to submit timely quarterly, semi-annual, annual and permit evaluation reports is a violation of the terms and conditions of P0104133 and P0103659. Violations of the terms and conditions of an effective permit are also considered violations of ORC 3704.05(C).

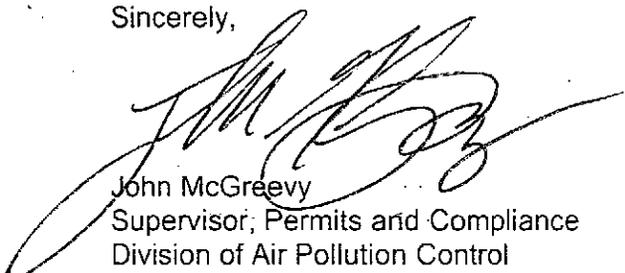
Requested Action

Ohio EPA requests that PCS submit the 2010 PER for K006 within 30 days of receipt of this letter. Additionally, please submit all future required reports as specified by the terms and conditions of effective permits. All reports must be submitted electronically through Air Services.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the ORC Section 3704.06. Submittal of the above requested information, including records and reports, does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC Section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Pam McCoy by phone at (614) 728-3810 or by e-mail at pam.mccoy@epa.ohio.gov.

Sincerely,



John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Adam Ward, Manager, CDO/DAPC
John Paulian, Supervisor, CO/DAPC

e: John McGreevy, Supervisor, CDO/DAPC