



PORTSMOUTH LOCAL AIR AGENCY

USEPA AND OEPA REPRESENTATIVE FOR ADAMS, BROWN, SCIOTO AND LAWRENCE COUNTIES
605 Washington Street, Third Floor, Portsmouth, Ohio 45662 (740) 353-5156 Fax (740) 353-3638

November 25, 2008

Certified Mail

Jerry Rowe
Plant Manager
Liebert Corp. – Ironton Facility
3040 S Ninth St.
Ironton, OH 45638

Re: NOTICE OF VIOLATION -
Facility ID: 0744010149
Liebert Corp – Ironton Facility
Location: 3040 S Ninth St.,
Ironton, OH 45638

Dear Mr. Rowe:

Our office has reviewed 1st quarter, 2nd quarter and 3rd quarter 2008 deviation reports submitted for your facility. These reports identified violations of your facilities air permit requirements.

Permit to Install 07-00490, issued on April 26, 2000, and Permit to Operate, issued October 6, 2006, for emission unit P001 (Fin Press FP-1A and Hairpin Bender) state that the coating usage in this emission unit cannot exceed ten gallons per day. The permits also state that the volatile organic compound (VOC) emissions from this emissions unit cannot exceed 62 pounds per day. Your quarterly reports indicate these limits have continually been exceeded. Specifically, the 1st quarter 2008 report identified three exceedances; 2nd quarter report identified ten exceedances and the 3rd quarter report identified eleven exceedances.

This agency has found these exceedances of the permit term and conditions to be in violation of OAC rule 3745-31-05(A)(3) and OAC rule 3745-21-09(U)(2)(e)(iii).

In the 3rd quarter report, Liebert Corp. indicated that on September 2, 2008 they began using a new oil (coating) with a lower VOC content then the oil previously used. While the use of this new oil will lower the daily VOC emissions, a ten gallon per day coating usage limitation is still in the permits for emission unit P001. Any coating usage over ten gallon per day will still be a violation of the terms and conditions of the permits.

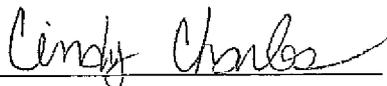
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This agency is requesting within 30 (thirty) days of receipt of this letter, that Liebert Corp. Please submit a compliance schedule which describes when the PTIO application will be submitted or outlines other steps to be taken to bring the abovementioned source into compliance

Acceptance by the Ohio EPA of a compliance plan and schedule 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 Anne Chamberlin at (740) 353-5156 or E-mail Anne.Chamberlin@epa.epa.state.oh.us.

Sincerely,



Cindy Charles
Director
Portsmouth Local Air Agency

Cc: John Paulian, OEPA, DAPC
Lisa Holscher, USEPA