



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 25, 2008

Re: Ross County
Vitaoe Industries Inc.
Facility ID # 0671010143
Inspection Warning Letter

Certified Mail #70041160000169052936

Larry Vitaoe
Vitaoe Industries Inc.
PO Box 224
100 Chamber Dr.
Chillicothe, OH 45601

Dear Mr. Vitaoe:

On April 16, 2008, I performed an inspection of Vitaoe Industries Inc. (Vitaoe) in Chillicothe, Ohio. While at the facility, I met with yourself and Mr. Jeff McGee. This inspection was conducted in order to determine the facility's compliance with state and federal air pollution rules and regulations. Included with this letter, is a copy of Ohio EPA's Facility Inspection Form (Appendix N), which was completed as part of my inspection.

During the review of records associated with each coating line's operations, a serious error was discovered in Vitaoe's method of calculating compliance with the short-term hourly volatile organic compound (VOC) emission rate. Section C.1. of both Permit to Install (PTI) #06-07366 and the Permits To Operate (PTO's) that were issued on 06/06/2005 allow for the daily averaging of emissions based on **actual** hours of operation. Since you have not tracked actual hours, it is difficult and time consuming to verify compliance with the hourly limit. In actuality, it is impossible to verify compliance unless Vitaoe did not exceed the hourly limits for each booth on a daily basis.

The computer spreadsheet developed to track coating usage at the plant tracks more than 30 data points. All that is necessary to demonstrate compliance with the pounds per hour VOC limit is listed in section C.1. of both the PTI and PTO as follows;

"The permittee shall collect and record the following information each day for materials used in emissions units K005 and K006:

- a. the company identification of each coating and cleanup material employed;
- b. the total number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon, excluding water and exempt solvents;
- d. the total VOC emission rate in pounds (the sum of (b) times (c) for all coatings employed);

Larry Vitatoc
Vitatoe Industries Inc.
April 25, 2008
Page 2

- e. the total number of hours the emissions unit was in operation;
- f. the calculated average hourly VOC emission rate in pounds per hour, **based upon the total daily coatings and cleanup materials employed, and the actual hours of operation of the emission unit, i.e., (d)/(e);** and
- g. documentation for each coating and cleanup material as to whether it is or is not a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).

Note: The cleanup materials employed by this emissions unit are captured and shipped off-site for reclamation. Therefore, for the purpose of tracking emissions, the number of gallons of cleanup material employed is the difference between the gallons of cleanup material received and the gallons of cleanup material shipped off-site."

The monthly spreadsheet failed to track the 12-month rolling totals of VOC's, Total Hazardous Air Pollutants (HAPs), and individual HAPs.

Each of these violations can carry a maximum fine of \$25,000.00 per offense per day as provided by the Ohio Revised Code 3704.06.

Within 30 days of receipt of this letter, Vitatoe Industries shall submit to the agency a compliance plan and schedule to address the deficiencies noted above. If you are unable to respond to any part of this request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5263.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

Sincerely,



Daniel J. Canter
Environmental Specialist
Division of Air Pollution Control
Southeast District Office Ohio EPA

DJC/mlm