



Environmental
Protection Agency

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

CERTIFIED MAIL # 91 7108 2133 3932 1838 3656

March 20, 2012

**Delaware County
Sam Dong Ohio, Inc.
OEPA ID: 0121010196**

James Osteen
Sam Dong Ohio, Inc.
801 Pittsburgh Drive
Delaware, OH 43015

**Re: Notice of Violation
Failure to submit reports and permit renewal applications**

Dear Mr. Osteen:

Ohio EPA, Central District Office (CDO) has conducted a review of records for Sam Dong Ohio, Inc. (Sam Dong) to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations. The review consisted of an examination of submitted compliance reports, fee reports and permit applications maintained at CDO. Below is a summary of the findings, violations and action items that need to be addressed as a result of the review.

Finding 1: Failure to submit quarterly compliance report

A review of CDO's records established that the following compliance report(s) were not submitted in accordance with the indicated sections of Sam Dong's permits.

<i>Permit</i>	<i>Emissions Unit(s)</i>	<i>Section(s)</i>	<i>Report(s)</i>	<i>Due Date</i>
P0108635	P015, P016, P017, P018, P019	e)(3)	4 th Quarter 2011	1/31/2012

Violation

Failure to submit timely quarterly reports is a violation of the terms and conditions of federally-enforceable permit-to-install and operate (FEPTIO) P0108635, issued November 23, 2011. Violations of the terms and conditions of an effective permit are also considered violations of Ohio Revised Code (ORC) Section 3704.05(C).

Requested Action

CDO requests that the 4th Quarter 2011 report be submitted to Ohio EPA as soon as possible, but no later than 30 days from receipt of this letter. The report must be submitted using the eBusiness Center: Air Services (<https://ebiz.epa.ohio.gov>). For assistance with Air Services you may contact Linda Lazich at linda.lazich@epa.state.oh.us or (614) 644-3626. In addition, training videos and guidance are available by clicking "Answer Place" on the main banner at www.epa.ohio.gov.

Finding 2: Failure to submit permit renewal applications

During the file review, CDO also discovered that Sam Dong has not submitted timely renewal permit to install and operate (PTIO) applications for the emissions units identified below. Each permit listed has expired and no PTIO renewal application has been received.

<i>EU ID</i>	<i>EU Description</i>	<i>Company Equipment ID</i>	<i>Permit Number</i>	<i>Expiration Date</i>
P003	Copper parts manufacturing	Header #6	P0082308	10/7/2000
P005	Copper parts manufacturing	Header #10	P0082309	10/7/2000
P002	Copper parts manufacturing	Header #4	P0082307	10/7/2000
P007	Copper parts manufacturing	Header #11	P0082310	10/7/2000

Violation

Failure to submit a timely permit renewal application is a violation of Ohio Administrative Code (OAC) 3745-31-02(A)(1)(b) and OAC 3745-35-02(A).

Requested Action

CDO requests that a renewal PTIO application be submitted for the above listed emissions units to Ohio EPA within 30 days from receipt of this letter. The application must be submitted using the eBusiness Center: Air Services (<https://ebiz.epa.ohio.gov>).

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.

James Osteen
Sam Dong Ohio, Inc.
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If you have any questions, please do not hesitate to contact Stephanie Habinak by phone at (614) 995-0673 or by e-mail at stephanie.habinak@epa.ohio.gov.

Sincerely,



Kelly Toth
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: John Paulian, Central Office DAPC
Adam Ward, CDO/DAPC

e: Stephanie Habinak, CDO/DAPC
John McGreevy, CDO/DAPC

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