



Environmental
Protection Agency

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

March 28, 2012

Franklin County
S&G Manufacturing Group
OEPA ID: 0125042425
Notice of Violation

Allen Stickell
S&G Manufacturing Group
4830 Northwest Parkway
Hilliard, OH 43026

**Re: Notice of Violation
K001- Hourly Organic Compound Emission Limitation**

Dear Mr. Stickell:

Ohio EPA Central District Office (CDO) reviewed S&G Manufacturing Group's 2011 operating records that were maintained pursuant to Permit to Install (PTI) 01-08088 and Permit to Operate (PTO) P0083283 for emissions units K001 and K002. The operating records show S&G Manufacturing Group violated the hourly organic compound emission limitation for K001 on multiple days in 2011.

1. **Findings**

S&G Manufacturing Group's operating records indicate that more than 5.0 pounds per hour of organic compounds were emitted from K001 on the following days in 2011: Jan. 5, Jan. 11, March 11, April 8, April 26, April 29, July 18 and Aug. 24.

Section A.1. of Part II of PTI 01-08088 for K001 states:

"Organic compound emissions shall not exceed 5.0 lbs/hr and 5.0 tons/yr, including emissions from cleanup."

Violation

Emitting organic compounds in excess of 5.0 pounds per hour is a violation of the terms and conditions of PTI 01-08088. Violations of the terms and conditions of an issued permit are also considered violations 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."

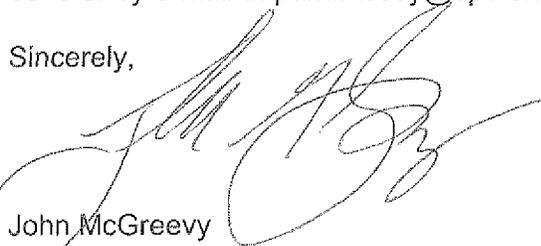
Requested Action

On March 20, 2012, Ohio EPA received a Chapter 31 permit modification application from S&G Manufacturing Group requesting an increase in the allowable hourly organic compound emission limitation for K001. The issuance of the modified permit will address the violation. No further action is requested.

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, DAPC/CDO
John Paulian, Supervisor, DAPC/CO

e: John McGreevy, Supervisor, DAPC/CDO