



**Environmental  
Protection Agency**

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

Re: Hancock County  
Back in Black dba Superior Trim  
Premise #0332010055  
Complaint Investigation  
Notice of Violation (NOV/Non-HPV)

May 17, 2012

**CERTIFIED MAIL**

Mr. Jeff Putman, Quality Manager  
Back in Black dba Superior Trim  
2100 Fostoria Road  
P.O. Box 842  
Findlay, Ohio 45840

Dear Mr. Putman:

This letter shall serve as a follow-up to the complaint investigation conducted on May 15, 2012, of the above referenced facility by Mr. Chad Winebrenner and this writer from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). The purpose of this investigation was to determine the validity of the complaint of glue odor coming from Back in Black.

Based on discussions with employees and observations during the investigation, our findings are as follows:

- (1) During the inspection, we requested to see Back in Black's monthly VOC records for the coating and cleanup materials for emissions unit R028 (Spray Booth #1). We were told that the facility is not currently keeping records. Failure to maintain records in accordance with the monitoring and recordkeeping requirements of Permit-to-Install and Operate (PTIO) P0108528, issued September 27, 2011, is a violation of OAC rule 3745-31-05 and ORC 3704.05. Back in Black should immediately start maintaining monthly records for R028, as required in d) (6) of PTIO P0108528.
- (2) Also during the inspection, you mentioned that you are not documenting the periodic and annual inspections of the dry particulate filter system from R028, as specified in d)(4) of PTIO P0108528. Failure to maintain records in accordance with the monitoring and recordkeeping requirements of PTIO P0108528, issued September 27, 2011, is a violation of OAC rule 3745-17-11(C) and ORC 3704.05. These records shall be kept from this point forward for emissions unit R028.

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- (3) Currently, Back in Black operates 17 foam presses ranging in size from 300 to 1000 tons. It was indicated that heat is applied while the press is molding. Based on the information provided during the site visit it was not ascertained whether these presses would qualify for an exemption under OAC rule 3745-31-03(A)(1) or is subject to rules and regulations under OAC rule 3745-31-02 regarding PTIOs. This office is requesting the facility to submit a determination of rule applicability to this office for further review. If the company finds the press lines require a permit, Ohio EPA is requiring that the company submit a PTIO application and corresponding EAC form.

Ohio EPA requests that Back in Black dba Superior Trim submit a written response with the information referenced in items (1) and (2) above, including a time line for implementing record keeping practices that more accurately reflect the requirements of the permit. The agency also requests emissions calculations and a rule applicability determination for item (3). The company should provide this information no later than June 15, 2012. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I would like to thank you for the courtesy extended during our visit. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3110 or electronically at [Alyse.Johnson@epa.state.oh.us](mailto:Alyse.Johnson@epa.state.oh.us).

Sincerely,



Alyse Johnson  
Division of Air Pollution Control

/cg

ec: Alyse Johnson, NWDO -DAPC  
Chad Winebrenner, NWDO- DAPC  
Jennifer Jolliff, NWDO- DAPC  
Julie McCarthy, NWDO-DAPC  
Bruce Weinberg, DAPC-CO  
Tom Kalman, DAPC-CO  
William MacDowell, US EPA, Region V  
Dennis Webb, Superior Trim  
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