



State of Ohio Environmental Protection Agency

Northeast District Office

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April 7, 2008

CERTIFIED MAIL

Mr. Gerald Emery
Epco Extrusion Painting Co.
413 McClurg Rd.
Boardman, OH 44512

**RE: FACILITY INSPECTION FOLLOW-UP AND WARNING LETTER FOR MACT
RECORD KEEPING AND REPORTING VIOLATIONS
EPCO EXTRUSION PAINTING CO.
DAPC FACILITY ID # 02 50 11 0856**

Dear Mr. Emery:

On March 20, 2008, an inspection of Epco Extrusion Painting Co. (Epco) was conducted to determine compliance with the facility's air pollution permits and with Ohio's air pollution control laws. The emissions units are required to have a Title V permit in accordance with Ohio Administrative Code (OAC) Rule 3745-77-02, "Title V Permit Rules - Prohibition and Applicability", and Title V inspections are authorized under OAC Rule 3745-77-07(C)(2). The purpose of this letter is to provide a written follow-up to the inspection.

Based upon the inspection and a review of record keeping and reporting, the facility, including the coating line (K001), the 5-stage parts washer (P001), and the fluidized bed hook clean-off oven (Z001), has some record keeping and reporting violations of its Title V permit, issued 8/10/05 and effective 8/31/05.

Weekly Checks

As discussed during the inspection, per Part III, Section A.III.4 of the Title V permit, Epco should be performing and recording weekly checks for any visible particulate emissions from the stacks serving the paint line (K001). Epco is currently recording the information in a computer spreadsheet. The records for 2007 could not be located on the spreadsheet, and it appeared that they might have been overwritten by the 2008 data. Also, the notes column for 2008 stated that white smoke was visible from the stack. Since white smoke would not be coming from the spray booth stacks, we determined that the readings were being taken from the wrong location (possibly steam from the parts washer). Therefore, please review the correct procedures for viewing and recording the weekly checks with the responsible operator. The semiannual deviation report for the period of time that the checks were being logged incorrectly should include the information on the deviation and the corrective action taken.

MACT Records and Reports

Also, during the inspection the records and reporting for the Miscellaneous Metal Parts and Products MACT, 40 CFR Part 63, Subpart M MMM, were reviewed and discussed. Epco is failing to include all of the information required by the MACT in its records and reports, in violation of sections 63.3930 and 63.3910 of the MACT.

The required records can be found in section 63.3930 of the MACT. For the emission rate without add-on controls compliance option that Epco has chosen to comply with, following is a list of the records that are required (please review section 63.3930 of the MACT for additional detail):

- A copy of each notification and report that you submitted to comply with the subpart;
- A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating;
- For each compliance period, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total volume of coating solids used each month; and the calculation of each 12-month organic HAP emission rate;
- A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period;
- A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight;
- A record of the volume fraction of coating solids for each coating used during each compliance period;
- The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period; and
- Records of the date, time, and duration of each deviation.

The records that Epco are currently keeping only include a pounds HAP/gallon value, instead of the pounds HAP/gallon coating solids required by the MACT. Please update your records to include the above-listed information.

Similarly, the MACT Notification of Compliance Status report that Epco submitted at the beginning of March is incomplete. Per section 63.3910(c)(8)(ii) of the MACT, the report should include the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate. In addition, the report should include an example of how you determined the value, including calculations and supporting data. The supporting data that was provided, an MSDS for the coating Polycron III Quaker Bronze, did not include the necessary information to perform the calculations. The manufacturer of each coating should be able to provide this information in a usable format.

GERALD EMERY

APRIL 7, 2008

PAGE 3

In addition, the report was signed by you, the plant manager. Only the president, secretary, treasurer, or vice-president in charge of a principal business function can act as the responsible official without notification to the Ohio EPA. Therefore, if you would like to be delegated the authorization to sign reports, you can decide which of two options apply. One is delegated authorization where the Director is notified but approval is not required, the other is delegated authorization where the Director is notified and approval is required. Attached is guidance entitled "Ensuring the Correct Person is Acting as the Responsible Official for a Facility Subject to Air Pollution Regulations., which further describes the options. If you wish to receive delegation to sign reports, please follow the steps described in the guidance.

Summary

In summary, please revise the weekly check protocol for the paint booth stacks so that the correct stacks are being checked, and the recorded information is retained in a format that is not easily erased. For the MACT record keeping, please revise your current records to comply with the MACT requirements and send a copy of your new format to my attention. For your Notification of Compliance Status report, please revise the report to include all of the necessary information, including a signature by the responsible official, and resubmit. Please submit this information **within 14 days of receiving this letter.**

The submission of the above information does not constitute a waiver of 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 Ohio EPA at a later date. This notice does not excuse any violations of federal, state and local laws or regulations regarding air pollution control. Failure to respond within the specified time frame can result in further enforcement action.

Thank you for the time and courtesy extended during the inspection. If you have any questions regarding this letter, please contact me at 330-963-1261.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control

JLG:bo

enclosure

cc: Bob Princic, Ohio EPA, DAPC, NEDO
Tom Kalman, Ohio EPA, DAPC, CO
Lisa Holscher, U.S. EPA, Region 5

ec: Dennis Bush, Ohio EPA, DAPC, NEDO
Ed Fasko, Ohio EPA, DAPC, NEDO