



**Environmental
Protection Agency**

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

February 15, 2011

RE: SIGMA OHIO, INC – PLANT 3
FACILITY ID 02 04 00 0423
NOVEMBER 30, 2010,
FACILITY INSPECTION

Mr. Jeff Dore
General Manager
Sigma Ohio, Inc. - Plant 3
149 South Cucumber Street
Jefferson, Ohio 44047

Dear Mr. Dore:

On November 30, 2010, Mr. Anthony Becker and I met with Mr. Joe McFarland of Sigma Ohio and Mr. Ted Hebert, Consultant with TJ Hebert & Associates, to conduct a facility inspection of your Jefferson plant. The operations of the emissions units were observed. The monitoring and record keeping was reviewed and the records collection at the emissions units was noted. The calculations were reviewed. Our records and the submitted deviation reports were also reviewed.

The records review and inspection indicated Sigma Ohio, Inc. Plant 3 is operating mostly in substantial compliance with the applicable air pollution rules. We note the Initial Compliance Status Report that this plant is subject to OAC rule 3745-21-25 was received on January 31, 2011, about a year late and in violation of this rule. Paragraph (S)(1) of this rule states the permittee shall submit this notification "not later than sixty days after December 14, 2009." Subsequent semiannual reports must be submitted following the initial report.

Although this plant likely operated in compliance with the applicable emissions limitations in the rule, the material records should be used to generate the missing reports, which should be submitted at your earliest convenience. Further, you need to be sure to always maintain up-to-date material use records and calculations to demonstrate compliance with 40 CFR Part 63, subpart WWWW, as well as OAC rule 3745-21-25. You must be able to produce these records upon request by an inspector from the Ohio EPA or the U.S. EPA.

This office further recommends you undertake a project to calibrate the pumps used at the coating booths, the gelcoat booths and the resin booths. This calibration should consist of devising a method to manually and accurately track the material used in each booth over a specific period, say one shift. The number of pump strokes would also be recorded and the two data sets reconciled. This information must be kept on file to back up the data used to determine material usage.

MR. JEFF DORE
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Should you have any comments or questions, please do not hesitate to contact me at 330-963-1216 or at Bridget.Byrne@epa.state.oh.us.

Sincerely,



Bridget Byrne
Environmental Specialist
Division of Air Pollution Control

BB:bo

pc: Mr. Joe McFarland, Sigma Ohio, Inc. (same address)
Mr. Ted Hebert, TJ Hebert & Associates