



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 18, 2007

CERTIFIED MAIL

Mr. Chester Mull
Mull Iron
10 Mull Drive
Rittman, OH 44270

Subject: Notice of Violation, April 3, 2007, Compliance Inspection; DAPC ID 02-85-02-0433

Dear Mr. Mull:

This letter is in follow-up to the April 3, 2007, Ohio EPA compliance inspection. The purpose of the inspection was to determine compliance with Ohio's environmental regulations concerning air pollution and with Mull Iron's permit-to-install (PTI) 02-21653 for emissions unit K001, metal coating operation, issued on January 19, 2006. Mark Grahan represented Mull Iron. Nancy Meli of Ohio EPA accompanied me during the inspection.

Mull Iron is in violation of Ohio's air pollution regulations and needs to take the prompt actions listed below to minimize the duration of non-compliance.

1. Failing to keep daily coating usage and volatile organic compound (VOC) emissions information for K001, as required by Term C.1 of PTI 02-21653.

Mull Iron updated the Excel spread sheet designed for these records until October 23, 2006, after which records ceased. The actual hard copy records of coating usage kept by the spray booth operator also could not be found during the inspection. In order to return to compliance, Mull Iron must:

- Immediately begin to keep the required daily records.
- Provide to this office a copy of the operators records kept after April 3, 2007, and a copy of the corresponding Excel spreadsheet entries.

2. Failing to submit the 2006 annual compliance report for K001 as required by Term D.2 of PTI PTI 02-21653.

Mull Iron did not submit the 2006 annual report required by the PTI 02-21653. These reports are due to the Ohio EPA, Northeast District Office, no later than January 31 of each year. In order to return to compliance, Mull Iron must:

- Submit the 2006 annual compliance report. The report must contain all the information required by Term D.2 of the PTI. In addition, the report must include a the date ranges for Mull Iron did not keep coating usage or emission information.

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3. Refusing entry on March 27, 2007, to Ohio EPA staff requesting to complete a compliance inspection, in violation of PTI 02-21653 and Ohio Revised Code 3704.05(E).

Mull Iron refused to allow me to enter the facility on March 27, 2007, during normal business hours. The purpose of the inspection was to verify that the facility returned to compliance with Ohio environmental regulations and with the PTI 02-21653 issued January 19, 2007. Ohio EPA, Division of Air Pollution Control, previously issued an Notice of Violation to Mull Iron on November 14, 2005, for unlawfully installing a spray coating operation and for failure to keep coating usage records as required by Ohio environmental regulations.

Ohio Revised Code 3704.05(E) states, in part, that "no person to whom a permit or variance has been issued shall refuse entry to an authorized representative of the director or the environmental protection agency ...or hinder or thwart the person in making an investigation."

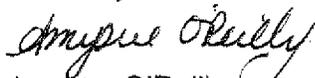
Refusing entry to an Ohio EPA representative is a serious matter. I encourage you to make appropriate accommodations for any future compliance inspection, announced or unannounced.

Be advised that violations of state air pollution regulations are punishable by civil penalty of \$25,000 per violation. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

I trust letters such as these will not be necessary in the future in order for Mull Iron to comply with Ohio EPA regulations and the terms outlined in the issued permits. I expect the complete and timely response to my attention at this office no later than May 1, 2007.

If you have any questions concerning this letter, please contact me directly at (330) 963-1298.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

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

cc: Tom Kalman, Ohio EPA, Central Office, DAPC
Lisa Holscher, U.S. EPA, Region 5