



State of Ohio Environmental Protection Agency

Northeast District Office

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Lee Fisher, Lieutenant Governor
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January 8, 2009

NOV AT SYNTHETIC MINOR HIGH
PRIORITY FACILITY - GC7

CERTIFIED MAIL

Mr. Terry Scott
Human Resources Director
Ashtabula Rubber Co.
2751 West Avenue
Ashtabula, OH 44004

RE: Division of Air Pollution Control Compliance Evaluation for the operations located at 2751 West Ave., Ashtabula, Ohio - DAPC Facility ID No. (02-04-01-0065)

Dear Mr. Scott:

On 12/18/08, Ohio EPA representative Christine McPhee visited the above-named site to determine compliance with the permits issued by the Division of Air Pollution Control (DAPC), and other applicable requirements. The time and courtesy given by Mr. Ted Hebert, a consultant with T.J. Hebert & Associates, and you was greatly appreciated. An electronic copy of the inspection report will be e-mailed to you.

The purpose of this letter is to provide a follow-up to the inspection. We found violations of the record keeping requirements within the recently issued Permit-to-Install (PTI) for the adhesive application operations (R002-R004 & R006) and the Permit-to-Operate for the rubber grinding/milling stations (P005). Additional information and/or revisions to the current record keeping programs is requested as discussed below.

(R002-R004) Automatic spray booths for adhesives application to metal parts for the bonding of rubber: Work Stations 342, 344A & 344B and (R006) Manual spray booth for adhesives application to metal parts for the bonding of rubber: Work Station 341

OAC Rule 374521-09(U)((2)(f) Exemption Requirements for R002-R004

Three adhesive spray operations at stations 342, 344A & 344B (R002-R004) are required to limit daily, combined adhesive usage to no more than 18 gal/day and are subject to a combined adhesive usage of 6,570 gallons, as a rolling 12-month average,



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if the VOC content limit(s) in OAC rule 3745-21-09(U)(1) cannot be met. The combined daily adhesive usage from R002-R004 records, required by PTI#02-14529 term C.1.d., were not requested during the 12/18/08 inspection. The combined daily adhesive usage records from R002 – R004 are needed to determine compliance with the usage limit of 18 gal/day.

1. If available, please submit records or spreadsheets of the daily adhesive (coatings) usage from R002-R004, combined, for the 7/01/04 – 12/19/08 period. If unavailable, please update the records format and submit a copy of the revised record or spreadsheet that shows an account of the daily adhesive usage, in gallons, from R002-R004 combined.

Our review of the annual emissions reports due by January 31 for the previous calendar year finds compliance with the 6,570 gallons limit, for each January through December 12-month period for the calendar years of 2004-2007; see page 6 of the inspection report. The monthly records of combined adhesive usage from R002-R004, combined, as a rolling 12-month value that are required by PTI# 02-14529 term C.2.g., were not requested during the 12/18/08 inspection.

2. If available, please submit records or spreadsheets of the adhesive (coatings) usage from R002-R004, combined, as a rolling 12-month summation for each month during the 7/01/04 – 12/19/08 period. If unavailable, please update the records format and submit a copy of the revised record or spreadsheet that shows an account of the rolling 12-month adhesive usage, in gallons, from R002-R004 combined.

PTI# 02-14529 term D.5. requires an annual report of Ashtabula Rubber's attempts to find and implement adhesives with a low VOC content that would comply with the limits in OAC rule 3745-21-09(U)(1). No low VOC content adhesive study report was found in our files for calendar years 2004-2007. If no drying oven heats the materials to temperatures of no more than 200° Fahrenheit, then the VOC content of coatings for metal parts is limit to 3.0 lbs VOC/gal, excluding water and exempt solvents, per OAC rule 3745-21-09(U)(1)(i). Otherwise, if a drying oven is employed, the VOC content of a coating would be limited to 3.5 lbs/gal, excluding water and exempt solvents.

3. If a low VOC content adhesive study was conducted for any of calendar years 2004-2007, please submit a copy of each one to our Northeast District Office.
4. If a low VOC content adhesive study was not conducted recently, please assess the adhesives currently employed.
 - a. State which VOC content limit is appropriate for each booth.
 - b. Identify each coating that is currently employed.

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- c. Note the VOC content, excluding water & exempt solvents, of each coating. Provide documentation for the VOC content of each coating.
- d. Please conduct a low VOC content study of adhesives for availability and feasibility and submit a report by 3/27/09.

Ohio Best Available Technology Requirements for R002-R004 & R006

PTI# 02-14529 terms C.2.a.iv. and C.2.a.viii require monthly records of cleanup material usage (the dispensed material less the recovered waste) and the OC emissions, respectively. The gallons of cleanup material dispensed and the gallons of material recovered are not recorded daily or tallied on the monthly spreadsheet, which is a violation of PTI term C.2.a.iv.

It is our understanding that methyl ethyl ketone (MEK) and xylene are employed as solvents to cleanup spray guns and hoses. Ashtabula Rubber representatives said that waste cleanup is recovered for use in making adhesive coating mixes. Currently, cleanup emissions may be attributed to coatings (adhesive) usage for each of R002-R004 & R006. Use of xylene, a hazardous air pollutant (HAP), as a cleanup material is a violation of the prohibition on the use of HAP-containing cleanup materials in PTI#02-14529 term A.2.d. for R002-R004 and A.2.c. for R006. According to the 3/29/01 application submittal for PTI 02-14529, acetone was proposed as the cleanup material. Waste acetone cleanup material was to be recovered for either re-use or recovery at each booth.

5. When were procedures changed from the previous use of acetone as a cleanup solvent material to the current cleanup procedures?
6. Please describe the procedures to clean spray equipment at each booth.
 - a. Note what is done with the waste cleanup solvent.
 - b. State how cleanup materials usage (dispensed amount less any recovered waste) could be measured to determine monthly OC emissions.
7. If xylene, a HAP, is currently employed as a cleanup material, please give us a compliance schedule of when xylene cleanup usage will be replaced with a non-HAP containing material or eliminated.

A review of annual emissions reports finds that single HAP emissions from R002-R004 & R006 combined do not exceed the 9.9 tons/year limit. Also, the combined HAP emissions from R002-R004 & R006, combined, do not exceed the 24.9 tons/year limit. MEK is not a HAP, so estimates of combined HAPs are slight overestimates.

8. For the annual 2008 report due 1/31/09 for R002-R004 & R006 emissions, please do include the following:

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- a. Summarize the adhesives usage from R002-R004, combined.
- b. Summarize the single HAP emissions for each HAP from R002-R004 & R006, combined.
- c. Summarize the combined HAP emissions from R002-R004 & R006, combined, excluding MEK, a non-HAP.

(P005) Five rubber parts grinding/milling stations with a wet scrubber to control PE

The requirements of state PTO the grinding/milling stations (P005), issued on 2/02/01, are still effective.

In order to assure optimum performance, PTO term C.1. requires that equipment to monitor the pressure drop across the wet scrubber be operated and maintained. During the 12/18/08 inspection, we found that there was no differential pressure drop gauge on the wet scrubber, which is a violation of PTO term C.1. Additionally, we found no records of daily pressure drop readings, which is a violation of PTO term C.2. No quarterly deviation reports, regarding the compliance status of maintaining the differential pressure drop within the range of 0.5 – 3 inches of water as specified in PTO term B.1., is a violation of PTO term D.1. We understand that Ashtabula Rubber is considering the replacement of the wet scrubber with a fabric filter.

9. Please submit a compliance schedule to install and test the operation (shakedown) of a gauge to measure the static differential pressure of the air flow across the wet scrubber.

An application for a renewal operating permit was received on 12/07/05. Additional information, requested on a revised version of the PTIO application, is needed for a complete entry into the STARS2 permit and reporting database.

10. Please submit a revised PTIO application for the rubber grinding/milling operations (P005). A copy of the 12/07/05 submittal is enclosed for your reference. Blank application forms are enclosed.
 - a. Complete all requested information for the wet scrubber on page 7.
 - b. Do complete all requested information for the stack egress on page 8.
11. If Ashtabula decides to replace the wet scrubber, please let us know what type of control device would be installed.
 - a. The estimated dates of the new control device installation and operation are requested.
 - b. A revised application for a renewal Permit-to-Install/Operation (PTIO) would need to be completed to include information about the new control device and submitted via eBusiness.

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Ashtabula Rubber representatives said that another operating parameter has been set at an ideal fan amp range to monitor performance of the wet scrubber. Although no amp readings are recorded, we understand that an alarm lights are tripped and that the fan may be shutdown when the fan current is out of the ideal amp range.

12. Please tell us when the scrubber fan alarm lights would be initiated.
13. Please describe what functions, if any, are automatically shut off if the fan amp is operating outside of the ideal range.
14. Please describe the periodic preventative maintenance program for the wet scrubber. Do note the frequency of tasks performed.

We acknowledge that the estimates of particulate emissions (PE) of 0.03 lb/hr, submitted with the renewal application received on 12/07/05, would comply with the 0.90 lb PE/hr limit.

Pending Permit Applications

An application for a federally enforceable Permit-to-Install/Operate (FEPTIO) for the spray booths (R002-R004 and R006) was received on 3/03/99. On 4/11/05, Northeast District Office (NEDO) made a recommendation of approval that included the terms of PTI# 02-14529, but was not processed as a final operating permit. The above specified compliance issues must be resolved before a recommendation of approval is processed for R002-R004 and R006.

After the compliance issues at the grinding/milling operations (P005) are resolved and a revised PTIO application is received, the application may be processed.

General Reporting Requirements

All future reports, permit applications and fee emissions reports must be electronically filed via the e-Business Center.

15. The fourth quarter 2008 report for the September 1 – December 31 period must include deviations of the non-HAP containing cleanup solvent usage restriction at R002-R004 & R006 and is due by 1/31/09.
16. The second semiannual 2008 report for the July 1 – December 31 period must include a description of the aforementioned record keeping and reporting deviations at R002- R004 and R006 and is due by 1/31/09 via e-Business.

Please submit the information requested in item nos. 1 - 3, if information is currently available, by **1/12/09**. If information is not available or record keeping revisions must be made, please submit the information requested in item nos. 1 - 7 and 9 – 14 by **2/06/09**.

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If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency. Failure to respond to this request in a timely manner can result in a referral to the Central Office of Ohio EPA for the appropriate enforcement action.

The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06 or for U.S. EPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

enclosures

cc: Tim Fischer, Ohio EPA, NEDO, DAPC
Tom Kalman, Ohio EPA, CO, DAPC
Lisa Holscher, U.S. EPA, Region V

ec: Ed Fasko, Ohio EPA, NEDO, DAPC
Terry Scott, Ashtabula Rubber Co., Inc.
Ted Hebert, T.J. Hebert & Associates