



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

November 29, 2010

RE: VENTRA SALEM LLC
FACILITY ID NO: 02 15 09 0195

Mr. Scott Tuel
Ventra Salem, LLC
800 Pennsylvania Avenue
Salem, Ohio 44460-2783

Dear Mr. Tuel:

On September 9, 2009, I met with Mr. Chris Staufeneger to determine general compliance with your draft Title V permit, which became final on October 21, 2010. I also viewed each permitted (or non-insignificant emissions units) and some of the insignificant emissions units at the facility. Some were in operation and some were not during the visit.

1. Ventra Salem is required to submit the following reports through Air Services, E-Business Center.

- Quarterly deviation reports

These reports identify exceedences of any emission limitation, violation of any operational restrictions and control device operation parameter limitations.

Your recent quarterly reports have not distinguished what is meant by "No deviations." Please be specific in future reports what it is you are reporting. For example, reporting the statement "No deviations of any emission limitation, operational restriction and control device operating parameter limit" is more specific than just "No deviations."

- Semiannual deviation reports

These reports identify any deviations from a federally enforceable monitoring, record keeping, and reporting requirements.

Your recent semiannual reports have not distinguished what is meant by "No deviations." Please be specific in future reports what it is you are reporting. For example, reporting the statement "No deviations of any federally enforceable monitoring, record keeping, and reporting requirements" is more specific than "No deviations."

- Title V Compliance Certification reports
Compliance certifications concerning the terms and conditions contained in your Title V permit that are federally enforceable emission limitations, standards, or work practices, are to be submitted before April 30th of each year.

Ventra Salem is current with these reports at this time. The report for 2010 will be due by April 30, 2011.

- Title V Fee Emissions reports
Title V fee reports are due annually by April 15 and contain the facility's actual emissions of particulate matter, sulfur dioxide, organic compounds, nitrogen oxides and lead for the previous calendar year.

Ventra Salem is current with these reports at this time. The report for 2010 will be due by April 15, 2011.

- Emission Inventory System reports
An emissions inventory is a compilation of data describing emissions from different sources of air pollution. Your report is due annually by April 15. These reports are usually submitted simultaneously with the fee emissions reports.

Ventra Salem is current with these reports at this time. The report for 2010 will be due by April 15, 2011.

- Semiannual MACT reports
Section B.6 of your Title V permit requires semiannual reports and other notifications as are required in the Maximum Achievable Control Technology (MACT) Standards for Surface Coating of Plastic Parts and Products, as contained in 40 CFR Part 63, Subpart PPPP.

40 CFR 63.4510(a) include general requirements, that refer to other rule citations. Ventra Salem (Blackhawk Automotive Plastics at the time) submitted an Initial Notification Report to Ohio EPA in May 2002. The report states that the facility is a major source of hazardous air pollutants (HAPs) and subject to 40 CFR Part 63, Subpart PPPP.

40 CFR 63.4510(c) requires Ventra Salem to submit a Notification of Compliance status report no later than 30 calendar days following the end of the initial compliance period. This would have been May 30, 2008. The Notice of Compliance status report was submitted and received by Ohio EPA late on April 23, 2010.

40 CFR 63.4520(a) requires Ventra Salem to submit semiannual compliance reports. The semiannual reporting periods are January 1 – June 30, and July 1 – December 31 of each year. Each report is required to be submitted no later than July 31 or January 31, following the end of the semiannual reporting period.

On April 23, 2010, Ohio EPA received the reports for May 1 – June 30, 2008, July 1 – December 31, 2008, January 1 – June 30, 2009, and July 1 – December 31, 2009. The semiannual report for January 1 – June 30, 2010, was due on July 31, 2010. To date, we have not yet received this report. Please submit this report as soon as possible, and all future reports in a timely manner.

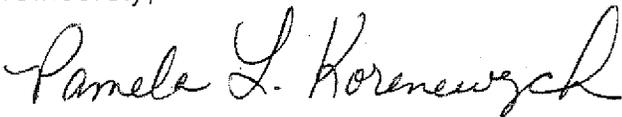
2. Term B.3 of your Title V permit provides your limitations for organic HAP emissions. During the visit, we discussed how you calculate the HAP emissions. Mr. Staufenegger reported that various information is entered into an excel spreadsheet that calculates those emissions. Your MACT reports (submitted on April 23, 2010) include a hard copy of the spreadsheet and sample calculations. However, a hard copy of an excel page does not show the equation that is used in the automatic calculation of emissions. Therefore, I requested Mr. Staufenegger to e-mail me a copy of one page of the excel document so that I may see the equation(s) being used. I also requested a written statement (letter or e-mail) that states that these equations in the excel document are correct in accordance with the MACT to accurately calculate your organic HAP emissions. To date, we have not yet received this information. Please provide the requested information as soon as possible.
3. During the visit, we discussed the requirements contained in your Title V permit, especially the facility-wide terms and conditions in section B. Paragraphs 2, 3, 4, 5, 6 and 7 in section B pertain to the MACT. We encourage all Ventra Salem staff tasked with ensuring compliance with the Title V permit to become thoroughly familiar with the MACT requirements.
4. Paragraphs 8 through 16 in section B pertain to the dry filtration systems on the emissions units. During the visit, I asked about paragraph #12 pertaining to the frequency of the dry filtration inspections. In an e-mail sent to me on November 3, 2010, Mr. Staufenegger reported that the filters are changed daily, as part of your General Operating Procedure (GOP). A change is not necessarily an inspection. We understand an inspection may not be needed if the change is performed daily. However, please expand your GOP to include "inspections" as required by paragraph #12 of your Title V permit.
5. During the visit, we also discussed the inventory of insignificant emissions units and I viewed most of them during the tour of the facility. It was reported that some changes were made, and an updated list of insignificant emissions units would be submitted before the end of the month (September 30, 2010). However, those updates were provided after that date. Therefore, your final Title V permit document does not have the updated list of insignificant emissions units.

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6. Emissions units R007 (Spray Booth P-C) and R037 (Spray Booth V-10) were found to be disconnected from their respective stacks. We understand they have been set aside elsewhere because of floor space issues. If you wish to use these booths again in the future, they should be restored to the original condition and operation. Additionally, a permit modification is not needed if an emissions unit is relocated within the building as long as all existing equipment (including each stack) will be moved and there will not be any change in equipment or operation.
7. We understand Ventra Salem may combine several emissions units to create a separate operation which would include control equipment. This project will need a permit-to-install (PTI) before any work may be performed.
8. The following requests are restated:
 - a. As requested in paragraph #1, please submit your semiannual MACT report for January 1 through June 30, 2010, to this office as soon as possible.
 - b. As requested in paragraph #2, please e-mail to me a page of the excel spreadsheet that can show the equation(s) you use to calculate organic HAP emissions. Please also provide a written statement (letter or e-mail) verifying that the equation(s) in the excel document are correct in accordance with the MACT to accurately calculate your organic HAP emissions. Please provide this information to this office as soon as possible.

If you have any questions, contact me at 330-963-1237 or by e-mail at pam.korenewych@epa.state.oh.us.

Sincerely,



Pamela L. Korenewych
Environmental Specialist
Northeast District Office
Division of Air Pollution Control

PLK:bo

ec: Misty Koletich, NEDO, DAPC

pc: Chris Staufeneger, Ventra Salem