



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 21, 2007

RE: Notice of Violation related to Final Findings and Orders V.2. requirements to submit semiannual exceedance reports pursuant to 40 CFR, Section 63.468, to NEDO for the second half of 1998 through second half of 2005, for the batch vapor degreaser.

02 43 01 1367

CERTIFIED MAIL

Mr. Daniel Gibbons  
Astro Manufacturing and Design, Inc.  
34459 Curtis Boulevard  
Eastlake, Ohio 44095

Dear Mr. Gibbons:

I am writing to you concerning a semiannual exceedance reporting requirement for the second half of 1998 through the second half of 2005, for the batch vapor degreaser at Astro. The exceedance is related to monitored parameters as described in 40 CFR, Section 63.468 (h) (Subpart T, the MACT for halogenated solvent cleaning).

I have included the above mentioned citation which is also available on Ohio EPA's website at <http://www.epa.gov/ttn/atw/degrea/fr12294.pdf>.

63.468 Reporting requirements.....

.....(h) Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an **exceedance report to the Administrator semiannually** except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, **an exceedance occurs**. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (l) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. **The exceedance report shall include the applicable information in paragraphs (h) (1) through (3) of this section.**

MR. DANIEL GIBBONS

MARCH 21, 2007

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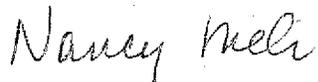
- (1) Information on the actions taken to comply with 63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that **monitored parameters** have returned to accepted levels.
- (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (3) **If no exceedances of a parameter have occurred**, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

To date, no semiannual exceedance reports for the above parametric monitoring requirements have been received at this agency. Please submit the required reports for the years of 1998 through 2005 within **two weeks of the receipt of this letter**.

Failure to comply with the above mentioned request may result in the referral of this violation to our central office for enforcement.

Please note that nothing in this letter, including the submission of the requested information, constitutes a waiver of Ohio EPA's authority to seek civil penalties for this or any other violations as provided in ORC 3704.06 or for the 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.

Sincerely,



Nancy Meli  
Environmental Specialist  
Division of Air Pollution Control

NM:bo

ec: Dennis Bush, DAPC, NEDO  
Ed Fasko, DAPC, NEDO  
Bob Princic, DAPC, NEDO  
Tracy Gu, DAPC, NEDO  
Lisa Holscher, U.S. EPA, Region 5  
Tom Kalman, DAPC, CO  
Bert Mechenbier, LCHD