



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

October 9, 2008

RE: UNIVERSAL CONTAINER REPAIR, INC.
DAPC FACILITY ID # 02 47 08 0780
AIR COMPLIANCE MONITORING INSPECTION
WARNING LETTER

CERTIFIED MAIL

Mr. Lynn Meyers
Universal Container Repair, Inc.
5109 Pearl Ave.
Lorain, OH 44055

Dear Mr. Meyers:

On September 17, 2008, I met with you to conduct an air compliance monitoring inspection at Universal Container Repair, Inc. ("Universal") in Lorain, Ohio. Thank you for your time and courtesy spent during the inspection. The purpose of the inspection was to ensure that all emissions units were in compliance with applicable state and federal air pollution control regulations. The following information summarizes the outcome of the inspection:

- At the time of the inspection, the spray booth, emissions units K001, appeared to be in compliance with state and federal air pollution control regulations.
- Also during the inspection, a paint dip tank was identified as requiring permits.
- Compliance is based on the walk-through inspection of the facility, conducting an inventory of all emissions units, reviewing on site operating logs and reports submitted to this office.

I have enclosed a Permit-to-Install/Operate ("PTIO") application and an Emissions Activity Category (EAC) form for coating operations. Please fill out an application and EAC form for the paint dip tank. Please mail them to me at the address on my business card. If you need assistance in filling out the application, please contact Adrienne LaFavre by phone at 330-963-1250. Please submit all information within thirty days (30) upon receipt of this letter.

If you have internet access, applications and the EAC forms can be filed electronically at our website, www.epa.state.oh.us. Click on E business center and you can set up an account, which will allow you not only to file applications, but also reports electronically. There is on line help on setting up the account and using the system.

Ohio EPA is issuing a warning to Universal for installing an emissions unit (the paint dip tank) and operating it, without first obtaining the required permits, which are violations of OAC rules 3745-31-02 and 3745-35-02. In addition, the coating used in the dip tank, identified as "dipping aluminum", exceeded the VOC content limit in OAC rule 3745-21-09(U)(1)(d) of 3.5 lb/gal, minus water and exempt solvents. The VOC content for the dipping aluminum coating was 3.93 lb/gal, minus water and exempt solvents.



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Based on a review of coating usage logs and material safety data sheets ("MSDS") for all coatings used for the past three years at the spray booth and the dip tank, total VOC emissions did not exceed the 15 tons per year limit, based upon a rolling 12-month summation nor exceeded the 5.62 tons per year, for each single HAP, based upon a rolling, 12-month summation. Those limits were established in a Federal Enforceable State Operating permit ("FESOP") for the spray booth, emissions unit K001.

Please submit a compliance plan that will demonstrate that the coating(s) in the dip tank will comply with the VOC content limit of 3.5 lb/gal, minus water and exempt solvents or less. Also, submit the PTIO application and EAC form and request the inclusion of VOC and HAP emissions from the paint dip tank within the facility-wide limits in the FESOP. **Please submit the compliance plan within thirty (30) days of receipt of this letter.** Failure to respond to this request in the requested time frame 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.

If you have any questions concerning this letter, please contact me at (330) 963-1187.

Sincerely,



Tony Becker
Environmental Specialist
Division of Air Pollution Control

TB:bo

enclosures

ec: Ed Fasko, Ohio EPA, NEDO, DAPC
Bob Princic, Ohio EPA, NEDO, DAPC
Adrienne LaFavre, Ohio EPA, OCAPP, NEDO