



State of Ohio Environmental Protection Agency

Northeast District Office

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October 30, 2008

**NOTICE OF VIOLATION
HIGH PRIORITY FACILITY GC7**

CERTIFIED MAIL

Mr. David Murtha
Director of Operations
Continental Structural Plastics of Ohio, LLC
333 Gore Road
Conneaut, OH 44030

RE: Division of Air Pollution Control Compliance Evaluation for the operations located at 333 Gore Rd., Conneaut, Ohio - DAPC Facility ID No. (02-04-02-0245)

Dear Mr. Murtha:

On 9/25/08, EPA representative Christine McPhee, visited the above-named site to determine compliance with the Title V operating permit issued by the Division of Air Pollution Control (DAPC), and other applicable requirements. The time and courtesy given by John Berwald, SMC Manufacturing Manager; Beverly Picard, Human Resources Manager; and Mr. Vinod Shah, Environmental Affairs Director, 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 respective Permits-to-Install (PTI) for the sheet mold compound (SMC) lines (P001 & P027) and the "Cowles" polyester resin paste mixer (P028). Additional information and/or revisions to the current record keeping programs is requested as discussed below.

Record keeping of weekly OC emissions from cleanup solvent usage at (P001) 24" SMC line, (P027) 48" SMC line and (P028) Polyester resin paste "Cowles" mixer

Term A.III.3. for P001, P027 and P028 within PTI-02-18224, issued on 9/23/04 and modified on 4/07/05, requires that a record be maintained of the organic compound (OC) emissions for all cleanup/purge materials, in lbs/week, for each week of operation. Likewise, term A.III.4. for a Chapter 31 modification of P028 within PTI 02-22050, issued on 8/22/06, requires that a record be maintained of the OC emissions for all cleanup/purge materials in lbs/week for each week. Our review of site records on 9/25/08 and of the electronic records received on 10/03/08 for the 1/06 - 9/08 period, found violations of the requirements to keep records of the weekly OC emissions in lbs/week at P001, P027 and P028 during the 1/06 - 9/08 period.

Ohio EPA acknowledges that daily records of cleanup/purge material usages and OC emissions in lbs/day exceed the weekly record keeping requirements. The 10/02/08 CSP e-mail from John Berwald explained that the daily OC emissions value in the Excel spreadsheet

will be highlighted as a bright color whenever the daily target level is exceeded. (The daily target level is set at the allowable limit of 261 lbs OC/week at each of three specified emissions units and divided by 7 days/week, resulting in 37.3 lbs OC/day.) With the current record keeping format, it is not apparent whether the weekly OC emissions limit from cleanup/purge operations was exceeded. Additionally, although no cleanup/purge materials usage is claimed for (P028) Polyester resin paste "Jayco" mixer, PTI 02-18224 does allow the option for the usage of cleanup/purge material, which must be recorded as well as the resulting OC emissions in lbs/week.

1. Please revise the record keeping program to include OC emissions from cleanup/purge operations in lbs OC/week for P001, P025, P027 and P028.
2. Please submit a copy of the revised record(s) and any related spreadsheet(s) for each of P001, P025, P027 and P028 to our office.

Monthly records of styrene throughput at (P028) Polyester resin paste "Cowles" mixer

Term A.III.5 for P028 in PTI 02-22050 requires monthly records of styrene throughput (usage) as a rolling 12-month summation in tons, to document compliance with a voluntary restriction per Ohio Administrative Code (OAC) rule 3745-31-05 (C) to limit emissions below major source levels. A review of the electronic records does show the cumulative styrene throughput in tons/day. A record of the rolling 12-month summation was not requested during the 9/25/08 site visit.

3. If available, please submit a copy of a recent record or spreadsheet page that shows an account of the rolling 12-month summation of styrene usage in tons. 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 summation of styrene usage in tons.

Monthly records of VOC emissions at (K001) Plastic parts coating line

PTI 02-19379 term A.III.5. requires monthly records of coating and cleanup operation(s) volatile organic compound (VOC) emissions as a rolling 12-month summation in tons. During the 9/25/08 review of site records, it was observed that monthly summaries of total VOC emissions are being made. A record of the rolling 12-month summation was not requested during the 9/25/08 site visit.

A review of the annual emissions reports for calendar years 2006 and 2007 shows that the highest rolling 12-month VOC emissions of 23.4 tons occurred in 12/07 and documented compliance with the VOC limit of 29.7 tons per rolling 12-months.

General Reporting Requirements

The third quarter deviation report of 2008, filed via the e-Business Center, was reviewed and approved. All future reports, permit applications, fee emissions reports and certification of compliance with a Title V operating permit must be electronically filed via the e-Business Center.

4. The second semiannual 2008 report for the July 1 – December 31 period must include a description of the aforementioned record keeping deviations at P001, P027 and P028 and is due by 1/31/09.

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5. You must include all non-insignificant emissions units in an updated facility profile via the e-Business program prior to submitting the next (fee) emissions report due on 4/30/09 for emissions during the 2008 calendar year. Please make the following updates in eBusiness and any other updates.
 - a. If operations ceased, (P008) press no. 4 may be designated as shutdown.
 - b. If operations ceased, (P009) press no. 5 may be designated as shutdown.

Our brief review of the facility profile shows that most non-insignificant emissions units are listed. However, a number of control equipment devices and several egress points are not associated with a particular emissions unit(s).

Until the requirements of any applicable Maximum Achievable Control Technology (MACT) rule is within a final Title V operating permit, MACT deviation reports must be sent to both Ohio EPA and U.S. EPA, Region V.

Status of Application for Renewal Title V Operating Permit (# P0084209)

A renewal application, A0014750, was uploaded on 11/06/06 for permit# P0084209. The administrative review of the application can begin in 11/08. We will contact you if additional information or revisions are needed.

Please submit the information requested in items nos. 1 - 3 and 5 and any other items that you wish by **12/01/08**. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency. 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

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

ec: David Murtha, Continental Structural Plastics of Ohio (CSP of Ohio)
John Berwald, CSP of Ohio
Beverly Picard, CSP of Ohio
Vinod Shah, CSP