



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

June 9, 2009

RE: ASTRO MODELING DEVELOPMENT  
34459 CURTIS BOULEVARD  
EASTLAKE, OHIO 44095  
FACILITY ID: 02 43 01 1367  
COMPLIANCE MONITORING INSPECTION (CMI)  
JUNE 3, 2009; AND NOTICE OF VIOLATION (NOV)  
LETTER

CERTIFIED MAIL

Mr. David E. Clucas  
Materials Manager  
Astro Modeling Development  
34459 Curtis Boulevard  
Eastlake, Ohio 44095

Dear Mr. Clucas:

I am writing to you concerning our June 3, 2009, compliance monitoring inspection at Astro Modeling Development on Curtis Boulevard in Eastlake of Lake County. I would like to thank you and your staff for the courtesy and cooperative efforts during the visit.

As a result of this compliance monitoring inspection, certain issues of concern, including compliance demonstrations, a degreaser operating restriction violation and reporting violations were found, based on the requirements in Permit-to-Install (PTI) 02-22421, effective date November 27, 2007 and are as follows:

I Compliance Monitoring Inspection

- a. Fee Emission Reports (FER) for 2007 and 2008 have been submitted. The 2008 report was submitted including the VOC emissions from each coating booth (K001 – K004) and the TCE degreaser (L001) as follows:

	<u>VOC/(HAPS)</u>
K001	2.4 tons per year
K002	2.4 tons per year
K003	2.4 tons per year
K004	1.2 tons per year
L001	2.33 tons per year

The allowables for VOCs from the PTI are 3.7 tons per year and 7.55 tons per year and for each coating booth and for the degreaser, respectively. Allowables (major source thresholds) for an individual HAP and total HAPs are 10 tpy and 25 tpy, respectively.

Note: The Astro calculation method for annual VOC emissions from the booths was reviewed and approved. In addition, records of the calculations for the determination of the annual VOC emissions from the coating booths and records of daily coating usage must be clear and detailed. A rolling 12 month summary for annual VOC emissions will be required and written into the first issue Title V permit to more frequently and closely monitor compliance with major source thresholds for the MACT.

#### **In Compliance with the annual VOC/HAP allowables**

- b. The 2007 report, since it included only particulate emissions and no VOC emissions, will require resubmittal electronically. Please contact our Columbus office for details.

It can be noted that after discussing this with our Columbus office, and since Astro employs HVLP guns, electrostatic application of paint and fiberglass filters along with a 3 gallon per day usage restriction, particulate emissions reporting for the booths is not necessary.

- c. After randomly reviewing spray booth records for the daily 3 gallon coating usage restriction for the year of 2008, compliance was determined. Please remember to include any clean up, additives and thinners when summing your daily and annual VOC emissions.

#### **In Compliance**

- d. To determine compliance with the 0.8 lb per hour VOC emissions limitation from the PTI, it is acceptable to sum all VOCs from a coating booth emitted on a **monthly** basis and determine the **average** emissions by dividing by the total operating hours for that booth for that month. This will, with no doubt, facilitate your record keeping.
- e. The question was presented, if Astro permanently discontinued trichloroethylene (TCE) usage in the degreaser, and if HAP(S) potential usage in the coating lines was restricted to below Title V thresholds (10 tpy and 25 tpy), would the Title V program still be applicable? It has been determined at this time that it would not, as long as VOC potentials remain below 100 tpy. However, synthetic minor requirements as opposed to true minor requirements may apply.

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- f. Butyl Acetate (tert butyl acetate) is not a HAP. After a google search, please see <http://www.highbeam.com/doc/1G1-81163597.html>, (no endorsement).
- g. Attached, please find the final degreaser MACT, 40 CFR Part 63, Subpart T (1994), as we discussed. You may find updates on OEPA's website under drop down list title 'MACT.'
- h. The following requirements for the degreaser were checked for compliance. The last item was discussed and is included in the 'Notice of Violation Letter' section of this letter which follows:
- Power cover
  - 13 sq ft solvent to air interface
  - Greater than 1 freeboard
  - <11.0 ft/min hoist speed
  - 26.01 degrees C coil temperature
  - Presence of primary condenser
  - Presence of freeboard refrigeration
  - Superheated vapor
  - Regular training documented by computer to satisfy many of the operational restrictions
  - Air blanket temp < .3 x bp of TCE(86.7)=26.01 C
  - Records of malfunction
  - Long spray wand to assure spray takes place in vapor zone
  - Owner's manual present on site
  - Record of TCE HAP content
  - Date of Installation of solvent cleaner on record
  - Device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils
  - Solvent temperature at the center of the superheated vapor zone is at least 10 degrees above bp 198 degrees**

## II Notice of Violation Letter

On June 4, 2009, a compliance monitoring inspection was conducted at Astro Modeling in Lake County, Ohio. The following violations/potential violations were found:

1. Operational Restriction Violation

For the degreaser, "the solvent temperature at the center of the superheated vapor zone is(must be) at least 10 degrees above the boiling point of the solvent." The boiling point of TCE is 188 degrees F. The allowable temperature becomes 198 degrees F. After random review of 2007, 2008 and 2009, Astro has maintained a temperature of no more than 180 degrees F.

**Please submit a compliance plan that details corrective action and proposed efforts to prevent the reoccurrence within in 30 days of the receipt of this letter.**

2. Reporting Violations

Reports shall be submitted beginning with the issue date of the PTI 11/27/2007 to the present, unless otherwise noted.

- a. No **quarterly deviation reports** were received by this agency for all measurement and checks etc., required by the degreaser MACT, 40 CFR Part 63, Subpart T and included in Part III, section A.IV.3,5,6,7,8,and 10 of the terms and conditions for L001 in the PTI (# 02-22421).

Please note according to A.IV.9.c. "if **no exceedence** has occurred, a **statement to that effect shall be submitted.**"

- b. No **annual solvent emission report** was submitted as required in Part III, section IV.11 of the terms and conditions for L001 in the PTI.

- c. No **annual report** containing the following information was submitted by February 1<sup>st</sup> of each year as described in Part III, section IV.11 of the terms and conditions for L001 in the PTI:

- i. a signed statement, by the facility owner or his designee, stating that "all operators of the solvent cleaning machine have received training on the proper operation of solvent cleaning machines and their control devices, sufficient to pass the testing required by the standard;" and
- ii. an estimate of solvent consumption during the reporting period and emissions of each HAP.

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- d. No **exceedence report on a semiannual basis** was submitted as described in Part III, Section IV.4. and as described in 40 CFR, Section 63.468 of the terms and conditions for L001 in the PTI.
- e. Relating to the coating booths, **no annual emission** report was submitted, as described in Part III, section IV.3. of each paint booth terms and conditions in the PTI.

**Please submit all of these reports within 30 days of the receipt of this letter.**

### III Enforcement Issue

Please submit to this office a certification in writing as described in the following excerpt from the Director's Findings and Orders in the matter of Astro Manufacturing and Design, Inc., December 29, 2006:

"Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Air Pollution Control acknowledges, in writing, the termination of these Orders."

*If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.*

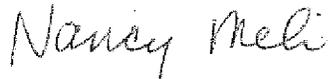
*The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."*

*This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is the person authorized to sign in OAC rule 3745-35-02 (B)(1) for a corporation or a duly authorized representative of Respondent as that term is defined in the above-referenced rule."*

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Please submit the requested information above within 30 days of the receipt of this letter and thank you for your continuing cooperation.

Sincerely



Nancy Meli  
Environmental Specialist  
Division of Air Pollution Control

NM:bo

attachment

ec: Ed Fasko, DAPC, NEDO  
Dennis Bush, DAPC, NEDO  
Tim Fischer, DAPC, NEDO  
Lisa Holscher, USEPA, Region V  
Tom Kalman, DAPC, CO