

**Environmental
Protection Agency**

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

November 2, 2010

RE: PERRY FIBERGLASS PRODUCTS, INC.
DAPC FACILITY ID # 0247030996
NOTICE OF VIOLATION
HIGH PRIORITY VIOLATION GC 2

CERTIFIED MAIL

Mr. Chad Pulliam
Perry Fiberglass Products, Inc.
33660 Pin Oak Parkway
Avon Lake, OH 44012

Dear Mr. Pulliam:

Ohio EPA is issuing a Notice of Violation to Perry Fiberglass Products, Inc. ("Perry") for exceeding the emissions limitation of 40 lbs/day of organic compounds (OC) while operating emissions unit R004, for exceeding the MACT emissions limitation of 113 lbs organic HAP/ton of resin, and for erroneously maintaining records of OC emissions emitted from emissions units P001 through P004.

Based on the Perry's 2009 facility emissions fee report, additional exceedances of the emissions limitations of 40 lbs/day of OC appear to have occurred while operating emissions units P001 through P004 as well as an exceedance of the annual emissions limitation of 7.3 tons/yr of OC for P001.

Perry is currently operating under permits to install (PTIs), specifically 02-17574, P0105151, P0105152 and P0106083. Terms and conditions in these PTIs require Perry to maintain records of daily OC emissions emitted from all emissions units; excluding OC emissions from facility-wide cleanup, which are maintained on a monthly basis.

On July 29, 2010, Frank Elchesen and I visited your facility for an air compliance monitoring inspection.

At this time, we observed four filament winding application areas. Two of the four were completely installed and operating, which included sprayup and filament winding applicators and drying racks. The other two were not completely installed and were comprised only of drying racks.

As explained to us during the inspection, product was made, but not yet cured, on the completely installed units. Then the uncured product was moved to the units that had only installed drying racks. The OC emissions emitted were divided between the completely installed filament winding application areas and the ones that had only installed drying racks.

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In taking an inventory of emissions units at Perry, I have identified one additional gelcoat application station and one less resin application station as compared to the number of emissions units that have been permitted for the facility. Again, to be clear, only two of the four filament winding application areas have been identified as being installed.

On August 23, 2010, this office had received your submittal of requested records for operations at Perry. It contained information from January 2010 to July 2010. After a review of these records, it was found that daily OC emissions for emissions unit R004 exceeded the limit of 40 lbs/day (see attachment 1). This is a violation of Ohio Administrative Code (OAC) rule 3745-21-07(G)(2). For emissions units P001, P002, P003 and P004, records indicated that OC emissions were split between completely installed filament winding units and units that were not completely installed. These are violations of the terms and conditions of PTIs 02-17574 and P0105151. Also, resin Aropol 7241 T-15 exceeded the MACT emissions limitation of 113 lb organic HAP/ton (see attachment 2). This is a violation of an emissions limitation in Table 3 of 40 CFR, Part 63, Subpart WWWW. This review of records consisted of evaluated only resins and gelcoats that were used from January 2010 to July 2010 (see attachment 2).

OC emissions must be calculated for each emissions unit using the appropriate emission factors for each resin/gelcoat application step. If your process is to first add a sprayup layer, then add a filament layer, and finally add another sprayup layer, use the appropriate sprayup emission factors and filament winding emission factors for each application step. If your process is to use hand layup and sprayup applications, then use the appropriate hand layup emission factors and sprayup emission factors.

In Perry's 2009 facility emission fee report, OC emissions were reported as follows: P001 (6.1 tons), P002 (5.0 tons), P003 (3.2 tons) and P004 (2.5 tons). See attachment 3. The maximum allowable for an installed emissions unit, based on 40 lbs/day and operating 365 days/yr, is 7.3 tons/yr. Since only two of four filament winding units have been installed, the summation of emissions from four emissions units to two indicated exceedances of the emissions limitation of 40 lbs/day of OC for each emissions unit, as well as the annual emissions limitation of 7.3 tons/yr for P001. These are violations of OAC rule 3745-21-07(G)(2) and terms and conditions of PTIs 02-17574 and P0105151.

Please correct the following violations: 1.) use appropriate emission factors for each resin/gelcoat application step and account for all OC emissions (sprayup, filament winding and drying) attributed to each emissions unit that has been installed; 2.) submit a permit application for an administrative modification to change one resin application station to a gelcoat application station; 3.) reduce the amount of resin used or change the type of resin to comply with the emissions limitation of 40 lbs/day of OC; and 4.) replace Resin Aropol 7241 T-15 with a compliant resin that will meet the MACT emissions limit of 113 lbs organic HAP/ton.

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Please provide documentation that the above violations have been corrected and that the facility has returned to full compliance **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.

New rule OAC 3745-21-25:

Please be advised that a new rule has been promulgated for the "Control of VOC emissions from reinforced plastic composites production operations". The rule citation is OAC rule 3745-21-25. See web site: http://epa.ohio.gov/dapc/regs/3745_21.aspx.

This rule is similar to 40 CFR, Part 63, Subpart WWWW ("Reinforced plastic composites production").

There are additional reporting requirements: an initial compliance report and semiannual reports. The initial compliance report is due, and it shall contain information found in paragraph (S)(1) of OAC rule 3745-21-25. The first semiannual report is due January 30, 2011 covering the period from December 14, 2010 to December 30, 2010. Subsequent reports are due 30 days after the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

Each report shall contain information found in paragraphs (Q)(3)(a) to (Q)(3)(h) of OAC rule 3745-21-25.

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/mt

attachments

cc: Tim Fischer, Ohio EPA, DAPC, NEDO
Tom Kalman, Ohio EPA, DAPC, CO
Bill MacDowell, U.S. EPA Region V