

 **SOUTHWEST OHIO
AIR QUALITY AGENCY**

May 29, 2012

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

DON DUNAWAY
STEELCRAFT MANUFACTURING COMPANY
INGERSOLL RAND
9017 BLUE ASH ROAD
CINCINNATI OHIO 45242

RE: NOTICE OF VIOLATION – RECORDKEEPING & VOC CONTENT

Facility ID: 1431150801

Emissions Unit: K013

STEELCRAFT MANUFACTURING COMPANY

Location: 9017 Blue Ash Road

Cincinnati, OH 45241

Hamilton County

Dear Mr. Dunaway:

On September 2, 2011 Steelcraft Manufacturing Co. notified the Southwest Ohio Air Quality Agency (Agency) and Ohio EPA about an exceedance of the 3.0 pounds per gallon VOC content limit in their permit to install P0105089, and permit to install and operate P0104800, for emissions unit K013, the frame flow coater paint line. On September 7, 2011, Steelcraft Manufacturing Company ("Steelcraft") also submitted a voluntary self-disclosure letter to Ohio EPA and sought to increase their VOC content limit to 3.5 pounds per gallon through permit modifications.

On September 7, 2011 Ohio EPA granted Steelcraft Manufacturing's request for the Director's enforcement discretion to operate. The discretion was granted under the condition Steelcraft shall not use coatings in K013 that exceed the 3.5 pounds per gallon VOC content limit.

On December 14, 2011 Ohio EPA assigned Steelcraft's voluntary self-disclosure letter to the Southwest Ohio Air Quality Agency. The Agency conducted an inspection at Steelcraft Manufacturing on January 5, 2012 to review the objectives listed in the audit disclosure. During the inspection, Steelcraft noted the independent laboratory VOC testing mentioned in the audit disclosure was not reliable because the results were less than one pound of VOC per gallon.

It was found by the Agency in the facility inspection that Steelcraft did not record the VOC content of the coating or cleanup "as applied"; instead the records documented the VOC content and usage separately for each product used in emission units. The failure to keep the required records is a violation of the PTI P0108700 terms and conditions.

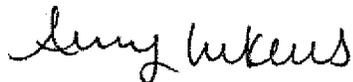
After reviewing the records, the Agency also determined the VOC content of the coating used in emissions unit K013 may not comply with the new 3.5 pounds per gallon VOC content limit established through the permit to install modification. The facility's annual volume weighted average VOC content calculated to be over 4 pounds of VOC per gallon. In addition, the volume weighted average VOC content for each month exceeded 3.5 pounds per gallon. VOC content compliance can be proven through a daily volume weighted average, however the high monthly volume weighted average prove some days must be out of compliance. The exceedance of the VOC content of 3.5 pounds per gallon is a violation of OAC rule 3745-21-09(U)(1)(c).

On February 3, 2012, Agency inspectors visited Steelcraft to better understand the coating process. The facility thins the coating with a high VOC solvent, R7K325. The facility also combines all Glycol Ether PNP used to clean the drain board and coating left on the drain board into the coating process tank to use for the next day. Combining the Glycol Ether PNP with the R7K325 reduced coating results in a higher "as applied" VOC content.

Southwest Ohio Air Quality Agency requests Steelcraft to develop a compliance plan to come into compliance with the above stated violations. Please submit this plan and information to the Southwest Ohio Air Quality Agency no later than June 25, 2012. Please also submit for emissions unit K013, for the last 5 years, a report summarizing the daily volume-weighted average VOC content, as applied, excluding water and exempt solvents for coatings employed in K013. Should Steelcraft Manufacturing not have accurate daily data to calculate the daily volume-weighted average, please provide the shortest averaging period for which accurate data is available. The volume weighted average shall be calculated as specified in OAC rule 3745-21-10.

Acceptance of the compliance plan does not constitute a waiver of authority to seek civil penalties as provided in section 3704.06, Ohio Revised Code. Determination to pursue or to decline such penalties in this case will be made by the appropriate agency at a later date. Failure to comply with the requirements of this letter may result in additional enforcement action including possible referral of this case to the Office of Attorney General.

Sincerely,



Amy Lukens
Environmental Compliance Specialist

cc: Monica Carsten, Steelcraft Manufacturing
ec: Bruce Weinberg, Ohio EPA
Bill MacDowell, US EPA