



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

Re: Crawford County  
Carter Machine Co., Inc.  
Premise # 0317030054  
**Resolution of Violation (ROV) – Non HPV**

August 1, 2012

**CERTIFIED MAIL**

Mr. Brian Rinehart  
Carter Machine Co., Inc.  
820 Edward Street  
Galion, Ohio 44833

Dear Mr. Rinehart:

This letter shall serve as notification of the resolution of violations cited in Ohio EPA's Notice of Violation (NOV), dated May 7, 2012. The NOV was based on Ohio EPA's review of the 2011 Annual Permit Evaluation Report (PER) for the Carter Machine Co., Inc. Crawford County facility, located at 820 Edward St. in Galion, Ohio, received February 14, 2012. In this report, deviations or exceedances from the operational restrictions or emission limitations of Permit to Install and Operate (PTIO) #P0086862, issued July 5, 2011, were noted for emissions unit P001 (5 hard chrome plating tanks with a composite mesh pad system). As a result of Ohio EPA's review of the PER report and the company's files, the following violations were discovered:

1. Pressure drop readings for the composite mesh pad system serving emissions unit P001 exceeded the allowable level of 6 inches of water, 18 times during the calendar year 2011. The following specifies the dates when pressure drop exceedances occurred: 01/18, 02/14, 02/15, 03/16, 03/17, 10/24, 11/01, 11/16, 11/17, 11/30, 12/01, 12/02, 12/05, 12/06, 12/14, 12/15, 12/16, and 12/23. A review of the company's file shows additional reports with indications that the emissions unit was operated with pressure drop readings above the permitted pressure drop range.

Each instance where the pressure drop for the composite mesh pad system operated in exceedance of the permissible pressure drop value is a violation of OAC rule 3745-31-05(A)(3), 40 CFR Part 63 Subpart N, and Ohio Revised Code (ORC) 3704.05.

In order to resolve the violations, the company submitted a compliance plan explaining steps taken by the company to correct the violations and prevent them from occurring in the future. The company's compliance plan was received by this office on May 24, 2012. In the compliance plan, Carter Machine has stated that new mesh was purchased for both of the Stage 2 cartridges as well as purchasing a complete cartridge (mesh and PVC frame) for Stage 1. Additional steps included working with the equipment manufacturer to discuss care of the mesh, tracking the age of the mesh, revising the operation and maintenance plan to include a statement that the emissions unit will not be operated outside of the pressure drop range stated in the permit and requiring an evaluation of mesh for degradation when cleaning is needed more frequently than once every 2 weeks, placing a label on the control panel with the permitted pressure drop range of 2 to 6 inches of water, and conducting training with department employees on the requirements for maintaining the pressure drop between 2 and 6 inches of water.

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An ongoing compliance status report for the time period between November 2, 2011 and May 1, 2012 was received on May 31, 2012. In this report, 8 additional days of a pressure drop readings above 6 inches of water were noted, which occurred in 2012 prior to Ohio EPA's discussion with Carter Machine regarding the violations. The dates of these exceedances are: 01/07, 01/27, 02/27, 02/28, 02/29, 03/07, 03/08, and 03/09.

Additional information regarding compliance status was requested on June 22, 2012 and received on July 9, 2012. This information included a picture of the label that was put on the control panel showing the operating parameters for the control device, a copy of a sign-in sheet from the training to discuss the ventilation system, a copy of e-mails between Carter Machine and Vanaire representatives, and a copy of the log of pressure drop reading since March 6, 2012. The latter pressure drop log shows no readings outside the allowable range of 2 to 6 inches of water, since March 9, 2012.

Based on the information submitted and discussed above, Ohio EPA considers the Notice of Violation dated May 7, 2012, to be resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3113, or via e-mail at [peggy.argabright@epa.state.oh.us](mailto:peggy.argabright@epa.state.oh.us).

Sincerely,



Peggy Argabright  
Division of Air Pollution Control

/cg

cc: William MacDowell, U.S. EPA Region V  
Jennifer Jolliff, DAPC – NWDO  
Ron Nabors, OCAPP – NWDO  
Peggy Argabright, DAPC – NWDO  
Bruce Weinburg, DAPC-CO  
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