



**Environmental
Protection Agency**

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

Re: D.S. Brown Company
300 E. Cherry Street
North Baltimore, OH 45872
Premise #0387000118
Notice of Violation (NOV/HPV-GC3)

August 10, 2012

CERTIFIED MAIL

Ms. Jennifer McGuckin, EH&S Manager
D. S. Brown Company
300 East Cherry Street
North Baltimore, Ohio 45872

Dear Ms. McGuckin:

This letter shall serve as the follow-up to the last three quarterly deviation reports that have been submitted. In those reports, the facility has identified deviations of annual rolling emission limitations and rolling usage restrictions for several emission limits in Permit-to-Install and Operate (PTIO) P0087865 issued final on October 26, 2011.

Based on the review of those deviation reports, the following conclusions are summarized as follows:

1. The fourth quarter of reporting year 2011 deviation report that was submitted on January 31, 2012, contained reference to deviations for emissions units K004 (plate coating area), K005 (shim dip coating line) and L001 (cold cleaner dip tank). The same deviations were reported in the first quarter of 2012, second quarter of 2012 and the third quarter of 2012. The deviations reported are as follows:
 - a) Emissions unit K004
 - i) exceedance of 2.35 tons of VOC per rolling 12-month limitation; and
 - ii) exceedance of 700 gallons based on a 12-month rolling summation.
 - b) Emissions unit K005
 - i) exceedance of 6.96 tons of VOC per rolling 12-month limitation; and
 - ii) exceedance of 2,275* gallons based on a 12-month rolling summation.
 - c) Emissions unit L001
 - i) exceedance of 2.68 tons of VOC per rolling 12-month limitation; and
 - ii) exceedance of 800 gallons based on a 12-month rolling summation.

* The maximum coating usage is split between Chemlok 205 (775 gallons) and Chemlok 252X (1500 gallons). The facility failed to identify whether the usage exceedance occurred with one or both coatings for emissions unit K005.

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2. The deviations noted above are violations of the federally enforceable emissions limitations and operational restrictions established in PTIO P01087865 as well as ORC 3704.05.
3. The facility will be required to submit a modification request via eBusiness Center in order to rectify the identified violations.

The company is required to submit the following information: a summary of the rolling VOC emission limitations and usage restrictions for each emission unit covered in the PTIO, a summary of HAP emissions for each emission unit covered under the rolling HAP limits established in the PTI, an explanation of what usage restriction was exceeded for K005, and a compliance plan for addressing the violations identified above, including, but not limited to, a PTIO modification request submitted via Ohio EPA's eBusiness Center. The requested information should be submitted by no later than **September 7, 2012**. The submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you should have any questions regarding the contents of this letter, feel free to contact me at (419) 373-3118 or mohammad.smidi@epa.ohio.gov.

Sincerely,



Mohammad Smidi, Environmental Specialist
Division of Air Pollution Control (DAPC)

/llr

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