



**Environmental
Protection Agency**

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

Re: Erie County
Akro-Mils
Premise # 0322020271
Return to Compliance (RTC)

August 21, 2012

Mr. Ty Shirley, Plant Manager
Akro-Mils
4101 Venice Road
Sandusky, Ohio 44870

Dear Mr. Shirley:

This letter shall serve as a follow-up to the Notice of Violation (NOV) letter dated June 14, 2012, for the above-referenced facility. The purpose of this letter is to indicate the facility's return to compliance status. This was accomplished by the issuance of Permit to Install/Operate (P0110605) for emission unit N001 (Burn Off Oven) issued August 16, 2012.

As a response to the NOV letter June 14, 2012, Akro-Mils provided Ohio EPA with a copy of the May 5, 2009, "Air Emission Source Inventory/Air Permit Applicability Review" conducted by Environmental Resources Management for the facility. Through a review of the information provided in the report, potential emissions generated from plastic mold injection operations, compression molding operations, and electrostatic powder coating operations would qualify as "de minimis" under OAC rule 3745-15-05. Additionally, compression molding operations would be exempt from permitting under OAC rule 3745-31-03(1)(m). Emissions from plastic grinding operations and woodworking operations would be exempt under OAC rule 3745-31-03(1)(y). Therefore, the facility would not be required to obtain permits for these operations.

Ohio EPA will update the facility profile to reflect the current emission units operating at the facility. The electrostatic powder coating line will be assigned an emission code of K003; plastic mold injection and compression operations with associated storage will be assigned an emission code of P001; woodworking operations will be assigned an emission code of P901; and plastic grinding operations will be assigned an emission code of P902. Emission codes K003 and P001 will reflect that emissions from these units meet the "de minimis" permit exemption and emission codes P901 and P902 will reflect that emissions from these units are exempt from permitting.

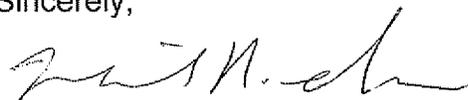
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Akro-Mils indicated that both emission units K001 and K002 were removed from service in May 2006. The facility profile will be updated to reflect that these two emission units have been permanently shut down. Permits associated with these two units will be terminated upon the date the emission units were permanently shut down.

Please note; however, that this return to compliance does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violations noted in the NOV letter. The decisions on whether to pursue or decline to pursue such penalties regarding this are dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions and/or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/lr

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