



AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT

*Agent of the Ohio Environmental Protection Agency • Division of the Akron Health Department
Serving Medina, Portage and Summit Counties*

TELEPHONE: (330) 375-2480
FAX: (330) 375-2402

L. M. Malcolm, P.E.
Administrator

February 16, 2011

CERTIFIED MAIL
High Priority Violator
General Criterion 7

Mr. Robert Spaans
Custom Pultrusions, Inc.
1331 South Chillicothe Road
Aurora, OH 44202-9218

Dear Mr. Spaans:

RE: NOTICE OF VIOLATION

This is in follow-up to my compliance evaluation conducted on Monday, January 31, 2011 at your Aurora, Ohio facility (1667020035) and is intended to summarize findings regarding the general compliance status of your facility with applicable air pollution control requirements. I would like to thank you and Elizabeth Huntington for your cooperation during my visit to your facility.

I must advise you that Custom Pultrusion, Inc has been and is still operating emissions units L004, P901, P902, P903, P904, P905, P907, P908, P909, P910, P911, P912, P913, P914, P915, P922, P923, P924, P925, P926, P927, P928, T003, T004, T005, T006, and T007 in violation of 40 CFR Part 63, Subpart WWWW, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, Permit to Install (PTI) P0106296, Ohio Administrative Code (OAC) rule 3745-21-25, and the Title V permit.

The NESHAP, PTI P0106296, OAC rule 3745-21-25, and the Title V permit require that you keep a certified statement that you are in compliance with the work practices and that you keep a copy of each notification and report that you submitted to comply with the regulation. These records are not being maintained. This constitutes a violation of section 63.5915(a)(1) and (d) of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-21-25(P)(1)(a) and (e), Section B - Facility-Wide Term and Condition 10 and Section C - Emissions Unit Terms and Conditions 2.d)(1)-(2), 3.d)(3) and (5), and 4.d)(1)-(2) of PTI P0106296, and Part II - Specific Facility Term and Condition A.39.(a)(1) and (d) of the Title V permit.

For the semiannual compliance reports, the NESHAP, PTI P0106296, OAC rule 3745-21-25, and the Title V permit require that you to have a statement that there were no deviations from the emission limitation or work practice standards during the reporting period if there were no deviations. There is no such statement in the semiannual reports that have been submitted to date. This constitutes a violation of section 63.5910(c)(5) of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-21-25(Q)(3)(d), Section B - Facility-Wide Term and Condition 11 and Section C - Emissions Unit Terms and Conditions 2.e)(2)d, 3.e)(2)d, and 4.e)(2)d of PTI P0106296, and Part II - Specific Facility Term and Condition A.38.(c)(5) of the Title V permit. Additionally, 40 CFR Part 63, Subpart A requires the owner or operator shall send a copy of each report

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submitted to the State to the appropriate Regional Office of the Environmental Protection Agency (EPA). It is my understanding that you have not been submitting the semiannual compliance reports required by 40 CFR Part 63, Subpart WWWW to US EPA. This constitutes a violation of section 63.10(a)(4)(ii) of 40 CFR Part 63, Subpart A.

OAC rule 3745-21-25 requires the owner or operator to submit an applicability notification by February 12, 2010. To date our office has not received this notification. This constitutes a violation of OAC rule 3745-21-25(S)(1).

For the pultrusion lines (P901 - P905, P907 - P915, and P922 - P928), the NESHAP, PTI P0106296, OAC rule 3745-21-25, and the Title V permit require that you keep all data, assumptions, and calculations used to determine the organic hazardous air pollutant (HAP) emission reduction and/or the volatile organic compound (VOC) emission reduction. During the inspection, how the percent reduction was calculated could not be determined. The spreadsheet had just a number without a formula in the cell. This constitutes a violation of section 63.5915(c) of 40 CFR Part 63, Subpart WWWW, OAC rule 3745-21-25(P)(1)(c), Section B - Facility-Wide Term and Condition 10 and Section C - Emissions Unit Term and Condition 3.d)(4) of PTI P0106296, and Part II - Specific Facility Term and Condition A.39.(c) of the Title V permit.

The Title V permit requires the production hours be recorded for each pultrusion line to determine the average hourly emissions. The production hours are not being recorded but instead 24 hours per day is being used for calculating the average hourly emissions whether or not the pultrusion line operated 24 hours during that day. This could potentially underestimate the average hourly emissions. This constitutes a violation of term and condition A.III.2 of Part III - Terms and Conditions for Emissions Units of the Title V permit for emissions units P901 - P905, P907 - P915, and P922 - P928.

The Title V permit requires the organic material emissions, the VOC emissions, and the styrene emissions to be calculated as a rolling, 365-day summation of the daily emissions. On the 42nd week of 2009, the spreadsheet converted from calculating these emissions on a rolling, 365-day summation to a rolling 52-week summation of the weekly emissions. Additionally, no emission calculations were performed during the 1st, 26th, 27th, and 28th weeks of 2009 and the 19th week of 2010. There should be emissions calculations whether or not there was any production. This constitutes a violation of Part II - Specific Facility Term and Condition A.2 of the Title V permit.

For the pultrusion lines (P901 - P905, P907 - P915, and P922 - P928) and the general fabrication machines (P919), the Title V permit requires the pressure drop across the baghouse to be maintained within the range of 2 to 5 inches of water. From the record keeping, there were 9 deviations of the pressure drop range for the pultrusion lines and 24 deviations of the pressure drop range for the general fabrication machines. During the inspection, dust collection system #1 was operating outside the allowable pressure drop range. This constitutes a violation of term and condition A.II.1 of Part III - Terms and Conditions for Emissions Units of the Title V permit for the above-mentioned emissions units.

There were several readings of zero for the pressure drop across the baghouses. This could indicate that the employee is either reading the pressure drop when no emissions units are operating, the pressure gauge is not properly operating, or the reading is being taken during the blow-back operation of the baghouse. The Title V permit does not allow for the pressure drop reading to be taken during the periods of the blow-back operation. Please verify what is causing the pressure drop readings to be zero.

The facility profile in Air Services for the dust collection systems does not match what is at the facility. The facility profile has only three dust collection systems (one for the mixers, one for the pultrusion lines, and one for the general fabrication machines). There are actually four dust collection systems at the facility. The general fabrication machines are vented to three different dust collection systems and the pultrusion lines are vented to two different dust collection systems. Please update the facility profile in Air Services to match what is actually at the facility.

The NESHAP, PTI P0106296, OAC rule 3745-21-25, and the Title V permit require the pultrusion lines to not exceed the maximum length of time for the enclosure to be opened for wet area enclosures. If the maximum time is exceeded then the 60 percent reduction cannot be taken into consideration when calculating the weighted average reduction. For emissions unit P914 on March 24, 2010 and emissions unit P923 on August 5, 2010, the open time for the enclosures appeared to be exceeded but in the calculations the 60 percent reduction was still used. Please revise these numbers and recalculate the percent reduction. For emissions unit P923 on June 8, 2010, emissions unit P923 on July 8, 2010, and emissions unit P915 on October 14 and 17, 2010, there appeared to be deviations of the open time for the enclosures but looking at the detailed spreadsheets for calculating the emission reductions the above-mentioned emissions units were not operating on these dates. Please review the wet area enclosure record keeping and verify that if the emissions unit exceeded the open time that the control efficiency of 60 percent was not used in the calculations for the emission reduction and the daily emissions. The record keeping for the open times for the wet area enclosures is not being performed consistently by the employees. It is also difficult to determine which emissions unit the record keeping is for. Please make sure the record keeping is being performed consistently and that the emissions unit that the record keeping is being kept for is identified.

The Title V permit and PTI P0106296 requires records of the identification and quantity (pounds) of each resin received for processing, the styrene content (% by weight) of each resin, and the emissions from each resin (styrene emissions for the Title V permit and VOC, OC and styrene emissions for the PTI). This data that is required by the permits was not easily accessible. The spreadsheets for calculating the emissions have records of the average styrene content per line, the average control efficiency per line, and the emissions calculated per line. Please either revise the record keeping to match what is required in the Title V permit and PTI P0106296 or modify these permits to match what record keeping is actually being performed.

For emissions units P901, P902, P903, P904, P905, P906, P907, P908, P910, P914, P915, P923, and P923, there were one or more deviations of the 40 pounds of total organic materials per day including cleanup material emission limitation from July 20, 2009 to January 27, 2011.

Emissions unit P902 on June 11, 2010 and emissions unit P923 on August 20, 2010 had deviations of the 8 pounds of total organic material per hour including cleanup materials emission limitation. I understand that these deviations have occurred due to the cleanup material usage being more precisely determined and that once the renewed Title V permit is in effect on February 17, 2011 the cleanup material emissions will no longer be included in the 40 pounds per day and hourly emission limitations. The Title V permit requires that any deviation of an emission limitation be report quarterly. The hourly emission limitation deviations were not report in the 2nd and 3rd quarter Title V deviation reports for 2010. The daily emission limitation deviations were not report in the 3rd quarter Title V deviation report for 2010. Please revise these quarterly deviation reports.

For the following dates and emissions units, the emissions were calculated to be negative: P903, P904, P905 on February 25, 2010; P903, P905, and P914 on November 25, 2009; P914 on December 2, 2009; P914 and P915 on April 8, 2010; P901, P904, P908, and P926 on April 21, 2010; P904 on April 30, 2010; P905 on June 4, 2010; P905 and P908 on July 20, 2010; P904 on October 8, 2010; P901, P902, P905, and P914 on November 10, 2010; and P903, P905, and P926 on November 18, 2010. From the calculation spreadsheet, the calculations for the cleanup material emissions are based on 2008 solvent receipts versus waste solvent shipped. The emission rate was determined to be 58 percent of the usage. The spreadsheet assumes 60 percent of the usage is emitted. Since the waste solvent is already accounted for in the calculations, I do not understand how the cleanup material usage and the emissions could be calculated as negative. Please explain why there is negative cleanup material usage and emissions.

For the storage tanks (T001 and T003), the Title V permits requires the daily record keeping of the type of resin stored in each tank, the styrene content of the resin, the organic materials content of the resin, the throughput of the resin for each tank, in gallons, and the daily organic material, VOC, and styrene emissions rates, in pounds per day. I could not determine if this information is being maintained in the spreadsheet. Please verify whether or not this record keeping is being performed.

For the mixers (P929, P930, and P931), the PTI P0106296 requires monthly record keeping of the total throughput of solvent, the VOC emission rate, the OC emission rate, and the styrene emission rate. The 2011 spreadsheet is not currently tracking this information. Please revise the spreadsheet to track the required information.

For the emission reduction limitation for 40 CFR Part 63, Subpart WWWW and OAC rule 3745-21-25, compliance with these emission limitations is suppose to be determined based on a 12-month rolling average per OAC rule 3745-21-25(O)(1)(a)(ii) and section 63.5900(a)(2) of 40 CFR Part 63, Subpart WWWW. Currently, these emission limitations are being determined on a 52-week rolling average. If you do not want to determine compliance as described in the above-mention regulations, you will have to submit a request for alternative monitoring and record keeping per section 63.8(f) of 40 CFR Part 63, Subpart A to US EPA Region 5 for approval and a request for a State Implementation Plan (SIP) revision to Central Office of the Ohio EPA. Additionally, the rolling 12-month annual emission limitations in PTI P0106296 are being maintained as a rolling 52-week summation of the weekly emissions. If you prefer keeping the

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emission calculations as a rolling 52-week summation, please submit a PTI administrative modification application via Air Services to modify the terms and conditions to match how you are doing the record keeping.

The deviations of the monitoring, record keeping, and report mentioned above must be reported in the semiannual Title V reports and the annual Title V compliance certification. Please make sure these deviations are reported.

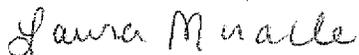
No later than fourteen (14 days) from the receipt of this letter, please submit the missing report, the above-mentioned revised reports, and a complete compliance plan and time schedule to this agency to bring the facility back into compliance with 40 CFR Part 63, Subpart WWWW, OAC rule 3745-21-25, PTI P0106296, and the Title V permit. The plan and schedule must contain specific steps that either are or will be taken to bring this facility into compliance along with their corresponding deadlines or milestone dates. If you need additional time, please notify this agency in writing.

The submission of the requested compliance plan and time schedule does not constitute a waiver of the authority of either the Ohio EPA or US EPA to seek penalties in this matter. The decision to pursue, or decline to pursue, additional enforcement action in this case will be made at a later date.

Keep in mind that this determination is based upon a site visit and preliminary review of available records. It does not ensure that you have been or will continue to operate in compliance and in no way limits any liability if violations are discovered for this time period.

If you have any questions, please contact me at (330)375-2480 extension 4239.

Sincerely,



Laura Miracle
Air Quality Engineer

cc: Mr. Tom Kalman - Ohio EPA, DAPC

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1. Article Addressed to:

Mr. Robert Spaans
 Custom Pultrusions, Inc.
 1331 South Chillicothe Road
 Aurora, OH 44202-9218

2. Article Number
 (Transfer from service label)

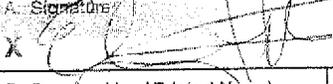
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