



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*

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L. M. Malcolm, P.E.
Administrator

September 5, 2007

CERTIFIED MAIL
High Priority Violator

Mr. Duane Kenyon
Plasti-Kote Company, Inc.
1000 Lake Road
Medina, OH 44256

Dear Mr. Kenyon:

RE: NOTICE OF VIOLATION

This is in follow-up to my facility inspection on August 27, 2007 and is intended to summarize my findings regarding the general compliance status of your facility with applicable air pollution control requirements. I would like to thank you for your cooperation during my visit.

I must advise you that Plasti-Kote Company, Inc. appears to be operating emissions unit R005 in violation of the Title V permit, Permit to Install (PTI) 16-1332, and Ohio Administrative Code (OAC) rule 3745-31-05 which states that the permittee will not use no more than five gallons of coating per day in this emissions unit. From May 14, 2003 to June 25, 2007, there appears to have been twenty-nine days where more than five gallons of coatings per day were employed in this emissions unit. Only the deviation on April 8, 2004 was reported in the quarterly deviation report as required by General Term and Condition A.1.c.ii of the Title V permit.

Plasti-Kote Company, Inc. is also not calculating and recording the total number of gallons of coatings employed for each day for emissions unit R005 as required by Part III - Term and Condition A.III.2.e of the Title V permit. Also, the daily organic compounds (OC) emissions for the coatings are not being calculated correctly in the spread sheet. Several coatings that are being employed are not accounted for in the calculation for the daily OC emissions. Also, the August 15th semiannual report required by PTI 16-1332 has not been submitted to date.

It also appears that several of the other emissions units have deficiencies related to the record keeping and reporting requirements of the Title V permit and/or the associated PTI. These deficiencies are described in the paragraphs below.

For emissions units K001, K002, K003, P007, P025, P026, R003, R004, and R006, it appears that you are not properly documenting whether or not each coating, cleanup material, and/or liquid organic material is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5) as required by OAC rule 3745-31-05(A)(3), either PTI 16-1940, PTI 16-1973, or PTI 16-02317 and/or the Title V permit.

CITICENTER - SUITE 904

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For emissions units K002, R003, R004, and R006, it appears that the volatile organic compounds (VOC) and acetone contents for each coating are not being maintained as required by the Title V permit and PTI 16-1940. A number on a spread sheet is not adequate documentation of the VOC and acetone contents for each coating.

When determining the monthly usage and rolling 12-month summation of the monthly usage for emissions units K002 and R004, it appears that you are not taking into account that the car color coating is thinned prior to being employed.

The spread sheet used to calculate the rolling 12-month summation of the coating usage figures is not calculating the summation on certain months for emissions units R003 and R006 because of an "if" statement in the equation. The rolling 12-month summation of the coating usage was not determined for January 2006, February 2006, and October 2006 for emissions unit R003 and for January 2006 for emissions unit R006 as required by OAC rule 3745-31-05(A)(3), PTI 16-1940, and the Title V permit.

There should be better documentation to show whether or not each cleanup material employed in emissions unit R004 contains VOC as defined by OAC rule 3745-21-01(B)(6) as required by PTI 16-1940 and the Title V permit.

The records of the VOC, individual hazardous air pollutant (HAP), and combined HAPS contents for each coating is not being maintained for emissions unit R007 as required by OAC rule 3745-31-05(A)(3) and PTI 16-02248.

For emissions unit P007, you are calculating the VOC emissions instead of the organic compounds (OC) emissions as required by OAC rule 3745-31-05(A)(3), PTI 16-1973, and the Title V permit. Also, the emission calculations for the OC emissions are not calculated as specified in PTI 16-1973 and the Title V permit. The calculations are required monthly. The spread sheet calculates these emissions on the day the batch was completed. This over estimates the daily emissions.

For emissions unit P025, you are not recording the OC emissions in ton(s) per month as required by OAC rule 3745-31-05(A)(3) and PTI 16-02430 but instead recording the rolling 365-day average of the OC emissions for each day.

The facility-wide record keeping appears to be slightly different for certain emissions units than what is required in the Title V permit. Different emission factors are being used to calculate emissions from emissions units P002 through P006. Gallons are recorded for the paint mixing operations instead of pounds. The record keeping for emissions units P025 and P026 is combined. The potential emissions for several insignificant emissions units that are used in your spread sheet to calculate emissions for the facility are either missing or different from what is stated in the Title V permit.

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The 2006 annual reports for emissions units K002, K003, P007, P018, P019, P020, P025, R003, R004, R006, and the entire facility were submitted late. The annual reports for emissions units K002, K003, P018, P019, P020, P025, R003, R004, R006, and the entire facility are due by April 15th of each year as required by the Title V permit, OAC rule 3745-31-05(A)(3), and either PTI 16-1940, PTI 16-01990, or PTI 16-02317 for emissions units K002, K003, P018, P019, P020, R003, R004, and R006, by OAC rule 3745-31-05(A)(3) and PTI 16-02430 for emissions unit P025, and by the Title V permit for the entire facility. The annual reports for emissions unit P007 are due by January 31st of each year as required by the Title V permit, OAC rule 3745-31-05(A)(3), and PTI 16-1973. Our office did not receive the 2006 annual reports for emissions units K002, K003, P007, P018, P019, P020, R003, R004, R006, and the entire facility until April 26th and for emissions unit P025 until May 1st.

Please be aware that any monitoring, record keeping and reporting deviation needs to be reported in the semiannual deviation report and the annual Title V compliance report.

Please submit a complete compliance plan and time schedule to this agency to bring the emissions units mentioned above into compliance no later than fourteen (14) days from the receipt of this letter. The plan and schedule must contain specific steps that either are or will be taken to bring these sources 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 either Ohio Environmental Protection Agency (EPA) or US EPA's authority 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.

If you have any questions or need assistance, please call at (330)375-2480 ext. 4239.

Sincerely,



Laura Miracle
Air Quality Engineer II

cc - Ms. Lisa Holscher - US EPA
Mr. Tom Kalman - Ohio EPA
Mr. Frank Markunas - Akron RAQMD