



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

May 12, 2009

CERTIFIED MAIL

Mr. Tom Alcorn  
Klaben Ford  
1089 W. Main Street  
Kent, OH 44240

RE: Notice of Violation

Dear Mr. Alcorn:

This is in follow-up to my facility inspection on May 11, 2009 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 and Artie Gissinger for your cooperation during my visit.

I must advise you that Klaben Ford Body Shop is operating Spray Booth #1 (emissions unit K001), Spray Booth #2 (emissions unit K002), and Spray Booth #3 (emissions unit K003) in violation of Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(c) which prohibits the operation of any air contaminant source without first obtaining authority to operate through issuance of a Permit to Install and Operate (PTIO) from the director. The Permits to Operate (PTOs) for emissions units K001, K002, and K003 expired on April 8, 2004 and to date no PTIO applications have been received for these emissions units.

It was determined from the facility inspection that the permittee is not maintaining monthly records of the identification of each coating and cleanup material employ, the number of gallons of each coating and cleanup material employed, the organic compound (OC) content of each coating and cleanup material, in pounds per gallon, the total OC emission rate for all coatings and cleanup materials, the number of days the emissions unit operated, and the average daily OC emission rate for all coatings and cleanup materials, in pounds per day (average) for emissions units K001, K002, and K003. Not maintaining the above mentioned records is a violation of OAC rule 3745-31-

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Mr. Alcorn  
May 12, 2009  
Page 2

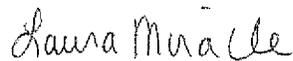
It was also determined from a review of the records at our office that the quarterly deviation reports have never been submitted for emissions units K001, K002, and K003. Not submitting the quarterly deviation reports is a violation of Special Terms and Conditions D.1 and D.2 and General Term and Condition 3.b of the PTOs.

Please submit a complete and approvable PTIO application, Emissions Activity Category (EAC) form, and process flow diagram for emissions units K001, K002, and K003 and compliance plan and time schedule to this agency to bring these emissions units 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 PTIO applications and 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 additional information, please contact me at (330)375-2480 ext. 4239.

Sincerely,



Laura Miracie  
Air Quality Engineer II

c: Ms. Lisa Holscher - US EPA  
Mr. Tom Kalman - Ohio EPA