



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 21, 2008

CERTIFIED MAIL  
High Priority Violator

Mr. Jerry Meadows, PE  
Thermo-Rite Manufacturing Co.  
1355 Evans Avenue  
Akron, OH 44305

Dear Mr. Meadows:

RE: NOTICE OF VIOLATION

This is in follow-up to my facility inspection on February 12, 2008 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 Thermo-Rite Manufacturing Company appears to be operating emissions units L001 (Baron-Blakeslee paint line degreaser) and L002 (Detrex Model No. VS-800 open-top vapor degreaser) in violation of section 63.465(b) of 40 CFR Part 63, subpart T, the Title V permit, and Permit to Install (PTI) 16-02355. The applicable rule and the effective permits state that the owner or operator shall on the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be established during the first month measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions.

Based on your records starting in April 2007, no solvent was added to emissions unit L002 and only 55 gallons of solvent was added to emissions unit L001 even though these emissions units have been operated during this time period. The addition of the 55 gallons of solvent to emissions unit L001 was not recorded as required by the Title V permit and section 63.467(c)(1) of 40 CFR Part 63, subpart T. For emissions unit L001, the solvent level was only one third of the way to the established fill line and emissions unit L001 had just been operated on February 7, 2008. Starting February 2007, Thermo-Rite Manufacturing Company has not been calculating the average halogenated hazardous air pollutant (HAP) solvent emissions on the first operating day of the month for emissions units L001 and L002 as required by the Title V permit, section 63.465(c) of 40 CFR Part 63, subpart T, and PTI 16-02355.

It appears that Thermo-Rite Manufacturing Company has operated emissions unit K002 (paint booth) in violation of the Title V permit, Ohio Administrative Code (OAC) rule 3745-21-09(U)(2)(e)(ii), and PTI 16-1956 which state the permittee shall employ no more than 3.0 gallons of coatings in any one day in this emissions unit. On December 15, 2007 and January 8, 2008, more than 3.0 gallons of coatings were employed in emissions unit K002. The daily volatile organic

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compounds (VOC) emission limitation was also exceeded on these dates which is a violation of OAC rule 3745-31-05, PTI 16-1956, and the Title V permit. Also, the name and identification of each cleanup material employed, the number of gallons of each cleanup material employed, the VOC content of each cleanup material, and the total VOC emissions from all cleanup materials employed are not being recorded as required by the PTI 16-1956, the Title V permit, and OAC rule 3745-31-05.

The Title V permit, OAC rule 3745-77-07(A)(3)(c), section 63.468 of 40 CFR Part 63, subpart T, PTI 16-1956, PTI 16-02355, OAC rule 3745-21-09(B)(3)(e), and OAC rule 3745-31-05 require the submission of quarterly and semiannual deviation/exceedance reports, deviation reports within forty-five (45) days after the exceedance occurs, and annual emission reports. Several of the required reports either have been submitted late, have not been submitted to date, or have had some type of deficiency.

The following reports have been submitted late:

- the July 30, 2007 and the January 30, 2008 semiannual exceedance reports for 3-month, rolling average trichloroethylene emissions for emissions units L001 and L002,
- the July 31, 2007, the October 31, 2007, and the January 31, 2008 quarterly deviation reports for the monthly organic compounds (OC) emission limitation for emissions unit L002,
- the July 31, 2007, the October 31, 2007, and the January 31, 2008 quarterly deviation reports for the rolling, 12-month coating usage limitation for emissions units K001 and K002,
- the July 31, 2007, the October 31, 2007, and the January 31, 2008 quarterly deviation reports for the daily VOC emission limitation for emissions unit K002,
- the January 31, 2008 annual VOC emission report for emissions unit K002, and
- the July 31, 2007 and January 31, 2008 semiannual deviation reports for deviations of the Title V permit's General Terms and Conditions, monitoring, record keeping, reporting, testing, and miscellaneous requirements.

The following reports have not been submitted:

- the annual solvent emissions report due February 1, 2008 for emissions units L001 and L002 and
- the maximum daily coating usage exceedance report for the exceedance that occurred on December 15, 2007 for emissions unit K002.

The following reports have the following deficiencies:

- the July 31, 2007 quarterly deviation report for the rolling, 12-month coating usage limitation for emissions units K001 and K002 did not mention whether or not there were any deviations of the rolling, 12-month coating usage limitation,
- the January 31, 2008 quarterly deviation report for the daily VOC emission limitation for emissions unit K002 did not report the December 15, 2007 deviation, and
- the January 31, 2008 semiannual deviation report for deviation of the Title V permit's General Terms and Conditions, monitoring, record keeping, reporting, testing, and miscellaneous requirements did not mention any of the reports in the previous six months that were submitted late, did not mention the testing deviations for emissions units L001 and L002, did not mention the monitoring deviations for emissions units L001, L002, and K002, and the reporting period stated in the deviation report was not correct.

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. A copy of the annual solvent emissions report form is enclosed. 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

Enclosure

**SENDER: COMPLETE THIS SECTION** | **COMPLETE THIS SECTION ON DELIVERY**

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 X *Vernon J. Blime*  Agent  Addressee

B. Received by (Printed Name) \_\_\_\_\_ C. Date of Delivery  
 2-22-05

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

1. Article Addressed to: NOV  
  
 Jerry Meadows, PE  
 Thermo-Rite Manufacturing Co.  
 1355 Evans Avenue  
 Akron, OH 44305

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
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4. Restricted Delivery? (Extra Fee)  Yes

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Sent to NOV  
 Jerry Meadows - Thermo-Rite Mfg. Co.  
 1355 Evans Avenue  
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