



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 10, 2007

CERTIFIED MAIL

Paul Kendall
WRAYCO Industries Inc.
5010 Hudson Drive
Stow, OH 44224

Dear Mr. Kendall :

RE: Notice Of Violation, Permit Record Keeping Requirements, High Priority Violator

On March 19, 2007 the Akron Regional Air Quality Management District conducted an inspection of your facility at 5010 Hudson Drive in Stow, Ohio. Based on the results of that inspection and the documents submitted to ARAQMD via email on April 20, 2007, a determination has been made that your facility may have been operating in violation of the following Ohio Administrative codes. A more complete set of records was submitted on April 27, 2007; however, these records also did not include the required HAP data.

I must advise you that it appears you may be operating in violation of the requirements of **OAC rules 3745-31-05(A), 3745-35-02(C), and 3745-35-07(B)** which state, in part, that the Director "may require the source to be equipped with instrumentation and sensing devices to monitor and record emission data and other information about the operation of the source". The records submitted to this office lack several of the items specified in the Permit to Install (PTI16-02391) issued to your facility on March 22, 2005. Specifically missing were the monthly calculation supporting the rolling emissions limitation for HAP and the monthly HAP records for each coating and solvent employed. The records are instrumental in supporting the compliance of your facility. All of the records in question are located in Section C.2 of PTI 16-02391.

Please submit the complete records for your facility's emissions for the last 6 months time frame for which the facility was operational through April 15, 2007. Specifically, required will be records in the PTI 16-02391 along with the calculations demonstrating the actual emissions of criteria and any Hazardous Air Pollutant(HAP). The records may be submitted electronically, if preferred, as long as they are readable by this office . The decision to pursue or decline to pursue enforcement action in this matter will be made at a later date.

CITICENTER - SUITE 904

146 SOUTH HIGH STREET • AKRON, OHIO 44308

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Paul Kendall
May 11, 2007
Page 2

Your response to this letter must be received by this agency **no later than fourteen (14) days from date of the receipt** and should include a compliance time line and any mitigating circumstances that may apply.

Thank you for your cooperation. If you have any questions or need further information, please contact our agency.

Yours truly,

A handwritten signature in black ink, appearing to read "L. M. Malcolm", with a long horizontal flourish extending to the right.

L. M. Malcolm
Administrator

c: Mr. Thomas Kalman - OEPA
Mr. Frank Markunas - ARAQMD
Mr. Lynn Malcolm - ARAQMD
Ms. Lisa Holscher - USEPA
Mr. Richie Scott - WRAYCO Industries

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Paul Kendall
 WRAYCO Industries Inc.
 5010 Hudson Drive
 Stow, OH 44224

2. Article Number
 (Transfer from service label)

7007 0220 0004 1204 2500

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Jane Morton

- Agent
- Addressee

B. Received by (Printed Name)

JANE MORTON

C. Date of Delivery

12-14-07

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

UNITED STATES POSTAL SERVICE



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* Sender: Please print your name, address, and ZIP+4 in this box *

Akron Air Quality
 146 S. High Street, Ste. 904
 Akron, OH 44308

