



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 8, 2012

CERTIFIED MAIL

Mr. Kevin Gearig, Facilities Manager
DTR Industries, Inc.
320 Snider Road
Bluffton, Ohio 45817

Re: NOTICE OF VIOLATION – GC2
Facility ID: 0302000166
DTR Industries, Inc.
Location: 320 Snider Road
Bluffton, OH 45817
Allen County

Dear Mr. Gearig:

This letter shall serve as a follow-up to the site visit conducted on October 25, 2012, of the above referenced facility by Jan Tredway and Jeffrey Skebba of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO). The purpose of this site visit was to discuss monitoring, record keeping and reporting requirements for anti-vibration automatic adhesive spray machines subject to 40 CFR, Part 63, Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

The following table shows which emissions units at the facility are subject to requirements in 40 CFR 63.3892(c) operating limits, and thus, also subject to Table 1, item No. 1, 6.a, and either 6.b or 6.c:

Emissions Unit ID	Unit Start-up Date	Date to Achieve Compliance*
K004	3/1/1989	1/2/2007
K009	4/1/1990	1/2/2007
K013	4/1/1990	1/2/2007
K016	1/1/1991	1/2/2007
K017	3/1/1991	1/2/2007
K018	3/1/1991	1/2/2007
K030	3/1/1997	1/2/2007
K031	3/1/1997	1/2/2007
K032	4/1/1997	1/2/2007

Emissions Unit ID	Unit Start-up Date	Date to Achieve Compliance*
K033	4/1/1997	1/2/2007
K043	3/1/1998	1/2/2007
K046	7/1/1999	1/2/2007
K055	4/1/2004	4/1/2004
K060	7/1/2005	7/1/2005
K062	6/1/2006	6/1/2006
K066	Not yet installed	Unit Start-up Date

* units installed prior to January 2, 2004, had three years to achieve compliance; units installed after January 2, 2004, must achieve compliance on unit start-up date

Since the facility is using a thermal oxidizer to achieve compliance, the applicable operating limits are:

Table 1, item No. 1: collect and record 3-hour average oxidizer combustion temperature and ensure the 3-hour average does not fall below the minimum combustion temperature established according to 40 CFR 63.3967(a).

Table 1, item No. 6.a: (for the permanent total enclosure at each spray booth): collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(b)(1) or the pressure drop across the enclosure according to 40 CFR 63.3968(g)(2); and maintain the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.

Table 1, item No. 6.b or 6.c: (for the permanent total enclosure at each spray booth): The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minutes; or the pressure drop across the enclosure must be at least 0.007 inch water, as established in Method 204 of Appendix M to 40 CFR, Part 51. The company is complying with item Nos. 1, and 6.a through 6.c in Table 1 based on our observations that the thermal oxidizer combustion temperature monitoring is being completed, and each spray booth has the appropriate monitoring equipment in place with instantaneous readouts of facial velocity and pressure drop. However, computer equipment has not yet been installed on each spray booth to record these monitored parameters. This is a violation of 40 CFR 63.3968(a), since data is currently not being recorded every 15 minutes for calculation of three-hour averages. This federal rule has not yet been included in a Title V permit, but will be included in the Title V renewal permit currently being processed. Regardless, the Ohio EPA has delegation of authority for this section of 40 CFR, Part 63, Subpart M.

It is our understanding that the company is currently planning to install the necessary computer equipment to come into compliance with 40 CFR 63.3968(a). Thus, please submit a written response by December 14, 2012 that includes:

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- compliance plan with schedule for equipment purchase and installation; and
- revised Title V deviation report for third quarter 2012 to show that the required recording of facial velocity or pressure drop every 15 minutes has not been completed. This information can be placed in the MACT emissions calculations section of the report.

Please be advised that submission of information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me at 419-373-3128 or E-mail jeffrey.skebba@epa.state.oh.us.

Sincerely,



Jeffrey Skebba
Division of Air Pollution Control

/llr

Certified Mail Receipt Number 7009 1410 0001 1834 4850

ec: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
Brian Dickens, Region 5 U.S. EPA
Jennifer Jolliff, DAPC, NWDO, Jeffrey Skebba, DAPC, NWDO