



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

Re: Marion County
SEMCO, Inc.
Premise # 0351010070
Notice of Violation (non-HPV)

December 13, 2012

CERTIFIED MAIL

Mr. Brett Tennar, Vice President/Plant Manager
SEMCO, Inc.
1025 Pole Road
Marion, Ohio 43302

Dear Mr. Tennar:

This letter shall serve as a follow-up to the inspection that was conducted at the facility on November 14, 2012, by this writer from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). The purpose of this inspection was to determine the compliance status of all air emission sources at the facility.

Based on discussions and observations during the inspection, and your December 3rd email, along with a review of the company's files, my findings are as follows:

1. PTI P0087342 issued on April 27, 2010, for emission units R001 - R006 (paint spray booths # 1 – 6) requires that the permittee shall perform and document inspections of the dry filtration system for each unit. The permit also requires the permittee to document any time periods when the dry filtration particulate filter was not in service while the emissions unit was in operation. To date, the company has failed to perform and document any of the requirements above, which are violations of P0087342 and Ohio Revised Code 3704.05. R001 and R002 have not operated since July of 2003, and R004 has not operated since July of 2006.
2. P0087342 for emission units R001 - R004 establishes a VOC content restriction of 5.17 lbs/gallon for coatings and clean-up materials. However, the previous PTI, PTI 03-07911 issued on November 29, 2001, only established a coating VOC content restriction of 5.17 lbs/gallon. Therefore, SEMCO should submit a letter to our office requesting that P0087342 be modified to remove the VOC content restriction for the clean-up material.

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3. During the inspection, the company expressed an interest in permanently shutting down emission units R001 and R002. Please submit a letter to our office listing these emission units and the dates when each source was shutdown. We will then update the facility profile in Air Services.

Ohio EPA requests that SEMCO submit a written response to this letter by January 7, 2013, which includes, at a minimum, a compliance plan and schedule to correct the violations noted above in item #1. Please note that the submission of the requested information to respond to this letter does not constitute 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.

All of the other emission units at the facility appear to be in compliance with our regulations at this time.

Thank you for the courtesy extended during my visit. Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,



Jay P. Liebrecht
Environmental Specialist
Division of Air Pollution Control
/llr

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ec: Erin Shalabe, DAPC-NWDO
Jennifer Jolliff, DAPC-NWDO
Bruce Weinberg, DAPC-CO
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