



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

Re: Erie County
Kyklos Bearing International, Inc.
0322020045
Notice of Violation (NOV/non-HPV)

February 14, 2013

CERTIFIED MAIL

Mr. James Guerra
Environmental Affairs Manager
Kyklos Bearing International, Inc.
2509 Hayes Avenue
Sandusky, Ohio 44870

Dear Mr. Guerra:

This letter shall serve as a follow-up to the additional information Kyklos Bearing International, Inc. ("KBI") supplied the Division of Air Pollution Control (DAPC) in a letter dated January 30, 2013. Information supplied by KBI was requested by DAPC in a letter dated January 16, 2013 following an inspection conducted at the facility on January 8, 2013. The following is a summary of the information provided:

1. KBI updated the facility profile in Air Services on January 24, 2013. As part of that update, twenty-five additional emission units were added to the facility profile. The facility indicated that all twenty-five emission units added met either the "de minimis" permit exemption or were permit exempt.
2. Upon the review of the facility files, emission calculations for the three RX Gas Generators (P046 or TMP175771) could not be located. KBI has indicated that this emission unit meets the "de minimis" (less than 10 lbs/day) permit exemption. If KBI believes this emission unit would qualify for a "de minimis" permit exemption under Ohio Administrative Code (OAC) rule 3745-15-05, KBI must submit emission calculations which support this decision.
3. KBI identified particulate emissions from the South T-10 area grinders (P324 or TMP175763) as meeting the "de minimis" permit exemption when the facility profile was updated. However, based on the emission calculations provided in the January 30, 2013 response letter, particulate emissions from this unit would not qualify as "de minimis".

4. KBI identified the emission units controlled by baghouses by supplying an inventory of the baghouse units which included potential to emit (PTE) calculations for uncontrolled particulate matter.
 - a. Emission calculations presented for P032, P-34 for twenty seven spindle/hub grinder units that are controlled by two 6,000 cfm baghouses that exhaust outdoors exceeds the "de minimis" requirements for particulate matter and does not qualify for a permit exemption. P032 is currently permitted under a registration status permit that was issued September 21, 1990. Because the maximum potential yearly emissions of particulates from the source are greater than 25 tons, this unit can no longer remain on registration status. In addition, emission calculations presented exceed "de minimis" requirements for particulate matter and do not qualify for a permit exemption.
 - b. Emission calculations presented for the following twelve emission units exceed the "de minimis" requirements for particulate matter and do not qualify for a permit exemption:
 - i. P307, B45 for sixteen hub lathe units that are controlled by one 9,000 cfm baghouse which exhausts indoors.
 - ii. P308, C40 for eighteen spindle lathe units that are controlled by one 9,000 cfm baghouse which exhausts indoors.
 - iii. P308, C42 for eleven spindle lathe units that are controlled by one 4,000 cfm baghouse which vents outside.
 - iv. P309, D34 for thirty two lir grinder units that are controlled by three 6,000 cfm baghouses which vent outside.
 - v. P309, D34 for fourteen lir grinder units that are controlled by three 6,000 cfm baghouses that vent outside.
 - vi. P310, P-22 for fourteen spindle lathe units that are controlled by one 8,000 cfm baghouse that vents inside.
 - vii. P310, P-25 for eleven spindle/hub lathe units that are controlled by one 8,000 cfm baghouse that vents inside.
 - viii. P310, P-28 for fourteen hub lathe units that are controlled by one 8,000 cfm baghouse that vents inside.

- ix. P311, EF17 for twenty four T10 lathe units that are controlled by one 9,000 cfm baghouse that vents inside.
- x. P312, A24 for sixteen hub grinder units that are controlled by two 12,000 cfm baghouses that vent outside.
- xi. P312, D30 for thirty two spindle grinder units that are controlled by one 16,000 cfm baghouse that vents outside.
- xii. P324 (TMP175763), D24 for fifteen T10 grinder units that are controlled by two 6,000 cfm baghouses which vent inside.

Currently, these emission units are classified as meeting "de minimis" requirements in the Title V Permit to Operate (PTO) P0086962 issued November 3, 2008.

- 5. The three Goff shotblasters (P037, P025, and P038) are each controlled by one 3,500 cfm baghouse which vent inside; therefore, emissions from these shotblasters would qualify for the permit exemption under OAC rule 3745-31-03(A)(1)(y). Therefore, it is anticipated that KBI will request in writing the revocation of PTI 03-02789 and PTI 03-07515 prior to the facility's Title V PTO renewal date.
- 6. Emissions associated with units identified in 4.b. above exceed the "de minimis" requirements for particulate matter and do not qualify for a permit exemption. Emissions associated with P032 identified in 4.a. above do not qualify for registration status. Modifications of these emissions units which resulted in their emissions exceeding the "de minimis" level in OAC rule 3745-15-05 and/or registration status in OAC rule 3745-31-08 is a violation of OAC rule 3745-31-02 and Ohio Revised Code (ORC) 3704.05.

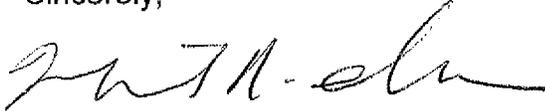
Therefore, KBI is required to submit thirteen PTI applications for emission units identified in 4.a. and 4.b. above in order to correct these administrative violations.

KBI is required to submit the information detailed above no later than **March 15, 2013**. Please be advised 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 pursuant to ORC Section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Mr. James Guerra
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Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

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