



Environmental
Protection Agency

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

Re: Erie County
Automotive Components Holding, LLC
Premise # 0322020042
**Inspection Letter/Notice of Violation
(NOV/non-HPV)**

November 22, 2011

Mr. Richard Frasca, Environmental Engineer
Automotive Components Holding, LLC
3020 Tiffin Avenue
Sandusky, Ohio 44870

Dear Mr. Frasca:

This letter shall serve as a follow-up to the inspection I conducted on October 26, 2011, with Jennifer Jolliff. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units with the rules and regulations of the Division of Air Pollution Control (DAPC).

Based on my discussions, my observations during the inspection, and a review of the company's records, my findings are as follows:

1. During a review of the facility's reporting history it was noted that Automotive Components Holding, LLC (ACH) was late in submitting their 1st Quarterly Deviation and 1st Semi-Annual Deviation reports consistent with the requirements found in Title V permit P0086958, issued June 11, 2008. This is a violation of Ohio Revised Code (ORC) 3704.05. It should be noted that ACH submitted this information on 9/28/2011. These reports have been reviewed and accepted, therefore this issue is considered resolved.
2. In addition, Title V permit P0086958 and PTI #03-13961 require that an annual report be submitted by January 31 each year for emissions unit R057 for any deviation from the 38.0 tons OC/yr emissions limitation. Ohio EPA-NWDO has no record of receiving this annual report since PTI #03-13961 became effective on 08/26/2003. Failure to submit this report is a violation of the TV permit, PTI #03-13961 and ORC 3704.05.

The compliance status of each Annual Title V Certification would need to be adjusted because of this violation dating back to 2003. In lieu of resubmitting each Title V Annual Certification, the facility needs to submit a letter to Ohio EPA and U.S. EPA stating that ACH had reporting deviations between the previously stated periods for failure to submit an annual deviation report for emissions unit R057.

3. Furthermore, in doing a facility file review prior to the inspection, it was determined that there was no final resolution as to whether Automotive Components Holding, Inc. (ACH) was a major or area source for MACT Subpart PPPP. On May 13, 2002, the facility sent an Initial Notification Report indicating that it is a major source for hazardous air pollutants (HAPS) and subsequently subject to 40 CFR Part 63, Subpart PPPP. An inspection was done on May 12, 2010, by a representative of Ohio EPA and a letter dated June 17, 2010, was sent to the facility requesting VOC data sheets and Material Safety Data Sheets (MSDS). In a response dating June 18, 2010, ACH stated that all clearcoating lines were converted to using de minimis or no HAP content materials thereby reducing the facility to an area source for MACT PPPP. Although the facility provided MSDS sheets and information on several coatings used in their processes, no clear determination can be made solely from this information. Ohio EPA is requesting that ACH submit a facility-wide potential to emit analysis for HAP levels at the facility on an emission unit basis. Ohio EPA is also requesting information on the specific date(s) that ACH stopped using coatings with high HAP contents and was no longer a major source.
4. In one of the discussions during the inspection, it was noted that five robotic adhesive cell units, emissions units P053, R028, R029, R030 and R033 need to be shut down and removed from the facility profile in STARs 2. ACH will need to input the shutdown dates into the facility profile to officially shut them down.

The company's written response to this letter is requested by December 19, 2011. The response should contain all pieces of information identified above in items #2 and #3 and the response should be submitted to Ohio EPA, Northwest District Office.

The submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Sincerely,


Chad Winebrenner
Division of Air Pollution Control

pc: Chad Winebrenner, Ohio EPA, DAPC-NWDO
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