



**Environmental
Protection Agency**

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

Re: Erie County
Automotive Components Holdings, LLC.
Premise #0322020042
Return to Compliance

December 22, 2011

Mr. Richard Frasca
Automotive Components Holdings, LLC
3020 Tiffin Avenue
Sandusky, Ohio 44870

Dear Mr. Frasca:

The Division of Air Pollution Control (DAPC) has reviewed Automotive Components Holdings, LLC's ("ACH") electronic mail received on December 16, 2011, which contained a response to DAPC's November 22, 2011, Notice of Violation (NOV). The NOV cited past deviations for failure to submit an annual emissions report for emissions unit R057. In order to return to compliance ACH was required to submit a letter to Ohio EPA and U.S. EPA stating their past deviations for 2008 – 2010. Also contained in the NOV was a requirement for the facility to demonstrate whether they are considered major for MACT PPPP. A facility-wide potential to emit analysis was required for hazardous air pollutants (HAPs) on an emissions unit basis. After further review, Ohio EPA has determined that the HAP levels at the facility did not trigger major source status for 40 CFR 63, Subpart PPPP.

The violations noted in the NOV have been addressed and are considered resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions, please contact me at 419-373-3121 or email chad.winebrenner@epa.state.oh.us

Sincerely,

Chad Winebrenner
Division of Air Pollution Control

/cs

pc: Tom Kalman, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA
DAPC, NWDO File
ec: Jennifer Jolliff, DAPC/NWDO
Chad Winebrenner, DAPC/NWDO