



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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February 27, 2013

Certified Mail

Reneé Copsey
3 Sigma Corporation
1985 W. Stanfield Rd.
Troy, Ohio 45373

**RE: FY 2013 Full Compliance Inspection Follow Up
3 Sigma Corporation
Ohio EPA Facility ID 0855140498**

Dear Reneé:

WARNING LETTER

This letter is in regards to operational restriction and reporting violations identified during site inspections conducted by the Regional Air Pollution Control Agency (RAPCA) on November 15, 2012 and January 14, 2013 at 3 Sigma Corporation (3 Sigma), located at 1985 West Stanfield Road in Troy, Ohio. This facility is identified by Ohio EPA Facility ID 0855140498. The violations were documented for Ohio EPA air emissions units (EUs) K004, K005, and K006. This letter also serves to address the failure to complete emissions testing for EU K005 in a timely manner.

The following table is a summary of the applicable permits for EUs K004, K005, and K006 at 3 Sigma:

Air Emissions Unit	Applicable Permit(s)
K004- No. 120 Coater	Permit to Install (PTI) 08-04713 issued and effective November 15, 2005 Permit to Operate (PTO) issued May 16, 2006
K005- No. 10 New Long Line Coater	PTI 08-04708 issued and effective November 15, 2005; administrative modification issued and effective February 21, 2008 PTO issued September 17, 2007
K006- No. 11 Old Long Line Coater	Permit to Install & Operate (PTIO) P0106145 issued and effective April 29, 2010

As identified in the above permits for EUs K005 and K006 and verified in past emissions tests conducted on the units, each is considered to be a permanent total enclosure (PTE) and 100% of air emissions are captured and vented to a thermal oxidizer (TO).

EU K005 & K006 Permanent Total Enclosure:

1) Emissions Unit Term and Condition B.6. in PTI 08-04708 and the PTO for EU K005 and Emissions Unit Term and Condition C.1.c)(8) in PTIO P0106145 for EU K006 require that the PTE be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water ("w.c.), as a 3-hour average, whenever the emission unit is operating. Records maintained by 3 Sigma indicated 3-hr average pressures in the range of 0.0001 to 0.006" w.c. throughout 2012 which failed to demonstrate compliance with the minimum pressure differential in violation of PTI 08-04708, the PTO for EU K005, PTIO P0106145 for EU K006 and Ohio Revised Code (ORC) 3704.05.

2) Pursuant To Term and Condition B.5.d of PTI 08-04708 and the PTO for EU K005, and Term and Condition C.1.c)(6)(d) of PTIO P0106145 for EU K006 all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the five percent surface area determination shall be completely closed to any air movement during process operations. During the January 14, 2013 site visit, 3 Sigma informed RAPCA that access doors to EU K005 and K006's PTE's have been left open frequently during process operations which failed to demonstrate compliance with the requirement to keep these doors closed in violation of PTI 08-04708, the PTO for EU K005, and PTIO P0106145 and ORC 3704.05.

3) Pursuant to Term and Condition D.3. of PTI 08-04708 and the PTO for EU K005, and Term and Condition C.1.e)(2)a.vi. of PTIO P0106145 for EU K006, quarterly reports must be submitted that identify any 3-hour blocks of time during which the PTE was not maintained at the minimum pressure differential of 0.007" w.c., as a 3-hour average and any period of time in which any access doors or window was opened during process operations. Quarterly reports submitted by 3 Sigma covering the 1st, 2nd, 3rd, and 4th quarters of 2012 failed to identify the above-noted pressure differential deviations and open access doors in violation of PTI 08-04708, the PTO for EU K005, PTIO P0106145 for EU K006 and ORC 3704.05.

EU K005 Emissions Test:

Pursuant to Term and Condition E.3. of the PTO for EU K005, 3 Sigma was required to conduct emissions and compliance demonstration testing on this emissions unit within six months of permit expiration. The PTO expired on September 17, 2012 and an emissions test was not conducted on EU K005 until November 15, 2012. The failure to test EU K005 within six months of the permit expiration date is a violation of the PTO for EU K005 and ORC 3704.05. RAPCA acknowledges that after a preliminary review of the results of the November 15, 2012 emissions test, EU K005 appears to be in compliance.

EU K004 VOC Content Limitation:

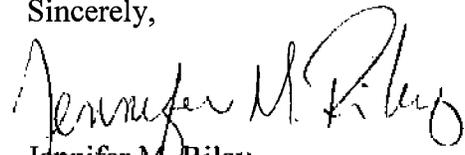
Pursuant to Term and Condition A.1. of PTI 08-04713 and the PTO for EU K004, and as cited in Ohio Administrative Code (OAC) rule 3745-21-09(F), the volatile organic compound (VOC) content of coatings employed in this unit shall not exceed 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents. Records for the month of May 2012 listed usage of 120

gallons of a coating, FASC 820-P, with a VOC content of 4.4 lbs VOC/gallon coating without water and exempt solvents. Use of a non-complying coating on EU K004 is a violation of PTI 08-04713, the PTO for EU K004, OAC rule 3745-21-09(F) and ORC 3704.05.

This letter serves as official notification of the aforementioned operational restriction and reporting violations for EUs K004, K005, and K006 and emissions testing requirement violation for EU K005 at 3 Sigma. The emissions test conducted for EU K005 on November 15, 2012 appears to show passing results; however, this determination is pending RAPCA's formal review of the report. Regarding the operational restriction violations, 3 Sigma submitted a letter to RAPCA on January 30, 2013 to address both the PTE pressure differential violations for EUs K005 and K006 and the use of non-complying coatings on EU K004. The letter detailed the corrective actions taken to resolve the pressure differential and open access door violations and included an explanation regarding the limitations of 3 Sigma's record keeping software which caused inaccurate records for EU K004. The letter is sufficient to address these violations and the information supplied in the letter was confirmed prior to receipt during a site visit performed by RAPCA on January 14, 2013. In order to comply with future reporting requirements, RAPCA reminds 3 Sigma that records must be reviewed to verify compliance and if deviations are noted, these must be reported as specified in the applicable permits. Enclosed, please find a copy of the reporting requirements as cited in the permits for EUs K005 and K006.

RAPCA appreciates your cooperation and the prompt corrective actions made after the November 15, 2012 site visit performed by RAPCA. If you have any questions, please feel free to contact me at 937-225-4438.

Sincerely,



Jennifer M. Riley
Air Pollution Control Specialist II
Abatement Unit

Cc Brian Dickens, U.S. EPA (via e-mail)
Bruce Weinberg, Ohio EPA (via e-mail)
Christine Swetz (via e-mail)