



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

Re: Seneca County
0374010117
Autolite
Stack Test
HPV-GC8*
Notice of Violation

March 5, 2013

CERTIFIED MAIL

Mr. Che Brindle
Autolite
1600 North Union Street
Fostoria, Ohio 44830

Dear Mr. Brindle,

The stack test conducted on January 10, 2013, on Ohio EPA emissions unit P074 (Dyno Cells), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Critical Test Data
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM	0.03 lb/MMBtu	0.10 lb/MMBtu	46.2 gallons gasoline/hr	51 gallons gasoline/hr
CO	195.11 lbs/hr	136.17 lbs/hr	46.2 gallons gasoline/hr	51 gallons gasoline/hr
VOC	7.40 lbs/hr	10.71 lbs/hr	46.2 gallons gasoline/hr	51 gallons gasoline/hr
NO _x	5.74 lbs/hr	4.08 lbs/hr	46.2 gallons gasoline/hr	51 gallons gasoline/hr

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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The emissions unit was being operated in violation of its allowable emission rates for NO_x and CO (violations of Title V term and condition Part III (P074) A.1.1., OAC rule 3745-31-05(A)(3), and Ohio Revised Code 3704.05). It will therefore be necessary to retest this unit or take other appropriate action(s) to achieve compliance with the applicable emission limitations.

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than March 25, 2013. Please note that the submission of the requested information to respond to this letter does not constitute a 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.

Please contact me as soon as possible regarding this matter at (419) 373-3052. Thank you.

Sincerely,



Andrea M. Odendahl
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC-NWDO
DAPC, NWDO Stack File
Follow-up File
Certified Mail Receipt Number 7011350000082042517

ec: Bruce Weinberg, DAPC-CO
Nidhi O'Meara, US EPA, Region V
Mark Budge, DAPC-NWDO
Jay Liebrecht, DAPC, NWDO
Jennifer Jolliff, DAPC-NWDO
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