



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

Re: Hardin County
Triumph Thermal Systems
Premise Number 0333000140
Inspection Follow-up/RTC

April 19, 2013

Mr. Stanley Coughlin
Triumph Thermal Systems
200 Railroad Street
Forest, Ohio 45843

Dear Mr. Coughlin:

This letter shall serve as a follow-up to the inspection conducted on April 15, 2013, of Triumph Thermal Systems by Ms. Julie McCarthy and myself from the Northwest District Office (NWDO), Division of Air Pollution Control (DAPC). The purpose of this inspection was to resolve outstanding issues associated with a Notice of Violation (NOV) issued February 13, 2004. Based on my observations during the inspection and a review of the company's files my findings are as follows:

1. Triumph Thermal Systems ("TTS") was inspected in 2004 by Ms. Wendy Licht and Mr. Jeffrey Skebba of the Ohio EPA. Based on their inspection, two cold cleaners were found to be in violation of Ohio Administrative Code (OAC) rule 37454-21-09(O)(d)(2)(iii) which requires covers to be closed whenever parts are not being handled in the cleaner.

Currently there are 10 cold cleaners throughout the facility. Each one is properly labeled and all lids were closed during the time of the inspection. The company has been complying with the work practices established in OAC rule 3745-21-09(O) and meets the permitting exemption in OAC rule 3745-31-03(A)(1)(w).

2. In 2004, TTS operated one trichloroethylene (TCE) degreaser subject to 40 CFR, Part 63, Subpart T, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvents. The company was required to submit an initial notification report and a permit-to-install (PTI) application including a determination on how it planned to comply with 40 CFR, Part 63, Subpart T.

In a letter dated March 22, 2004, TTS submitted the information requested above. As of March 2005, the facility phased out TCE and began using N-propyl bromide as a substitute. In 2006, the facility ceased all degreasing operations and has since removed all degreasers.

3. The facility operates two spray booths which share an infrared oven (Ohio EPA ID R001). The spray booths and infrared oven are connected to the same system which exhaust out a shared stack. R001 was placed on registration status on April 18, 1986.

Since 2004 TTS has been maintaining records showing actual emissions for both spray booths as a combined limit. The emissions are below the permitting threshold and qualify for the "de minimis" exemption under OAC rule 3745-15-05. The facility should request a revocation for R001's registration status, and provide actual emissions for the previous three calendar years.

Triumph is allowed to use the current tracking system and maintain the emissions for both spray booths as a combined calculation. Should emissions approach the permitting level, TTS will be required to maintain separate emissions calculations to demonstrate "de minimis" status.

4. TTS performs salt brazing operations followed by molten salt braze baths. Particulate emissions are the only air contaminants emitted from this process. As a follow-up to the inspection conducted in 2004, Ohio EPA requested that a determination be made as to whether each tank qualified for a "de minimis" exemption pursuant to OAC rule 3745-15-05 or a permanent exemption specified in OAC rule 3745-31-03.

The company provided calculations proving the source to be "de minimis" pursuant to OAC rule 3745-15-05. Since the last inspection no modifications have been made to the salt brazing operation.

5. The heat exchanger is processed through a series of tank baths in order to enhance corrosion resistance of the material. Open top tank #3 is filled with 5.6% Oakite L-25 in Water. This solution contains hexavalent chrome. Calculations have been submitted showing this emissions unit to meet the "de minimis" requirements established in OAC rule 3745-15-05.
6. TTS continues to utilize mineral spirits in 28 individual flushing test stands. Based on the potential to emit calculations submitted, these test stands are considered to be "de minimis" pursuant to OAC rule 3745-15-05.
7. The facility operates three natural gas fired boilers which are exempt from all permitting requirements pursuant to OAC rule 3745-31-03(A)(1)(a).

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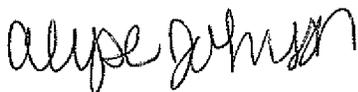
8. The facility also operates a natural gas fired emergency generator (P001). This is permitted under permit-by-rule PBR09939, issued July 10, 2012. Currently, our records indicate this emissions unit has not been installed. Please provide this office with the installation date and the date the emissions unit began operation.

Because the facility has removed all degreasers and is complying with the provisions established in OAC rule 3745-21-09(O) for cold cleaners, you are no longer in violation and are considered to have returned to compliance with the above cited violations. However, the company should provide a written response to this letter including the information requested in items (3) and (8) no later than **May 3, 2013**.

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.

Thank you for the courtesy extended during our visit. If you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3110 or email at Alyse.Johnson@epa.ohio.gov. Should you have any other questions or concerns pertaining to future business concerns, please feel free to contact Julie McCarthy at (419) 373-3115 or via email at Julie.McCarthy@epa.ohio.gov.

Sincerely,



Alyse Johnson
Environmental Specialist
Division of Air Pollution Control

/llr

ec: Alyse Johnson, NWDO - DAPC
Julie McCarthy, NWDO - DAPC
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Stanley Coughlin, Triumph Thermal Systems
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