



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

April 5, 2013

RE: Morgan County
ABC Manufacturing
Facility ID #0658000205
Notice of Violation
Non-HPV

Certified: 70122920000138146062

Mr. Wade Benjamin
ABC Manufacturing
P.O. Box 369
Malta, OH 43758

Dear Mr. Benjamin:

On August 28, 2012, Ohio EPA, Division of Air Pollution Control (DAPC), Southeast District Office (SEDO), sent a Notice of Violation (NOV) letter to ABC Manufacturing as a result of the site visit on August 14, 2012. A follow-up site visit was conducted on September 11, 2012.

The August 28, 2012, NOV addressed violations in regards to recordkeeping and reporting, and also asked for an evaluation of the spray paint booth and the mill process to determine whether or not permits-to-install and operate (PTIOs) were necessary. Misty Andrews and Buddy Sams of ABC Manufacturing worked with SEDO to address the recordkeeping and reporting violations, required reports and records were submitted to SEDO by October 31, 2012.

During the September 11, 2012, follow-up site visit, I met with Terry McGrath and Timothy Benjamin of ABC Manufacturing and viewed the following air sources that need a potential-to-emit (PTE) evaluation: spray paint booth, mill area and powder coat wash system. Based upon that follow-up visit, I sent an email to Misty Andrews on September 12, 2012, requesting that ABC Manufacturing perform a complete PTE evaluation of those three sources and giving her contact information for Ralph Witte in our Office of Compliance Assistance and Pollution Prevention if she needed help with the evaluations.

Misty provided me with some of the coating information for the spray paint booth and powder coat wash system on September 14, 2012. To date, I have not received the PTE evaluation for the three air sources. An email from Buddy Sams, dated December 21, 2012, indicated that Ralph had evaluated the mill and both paint lines and was still waiting on additional information for the powder coat wash system, and that Ralph felt permits were required for the mill and spray paint booth, and possibly the powder coat wash system.

Even though, emissions unit (EU) K001 (dip coat tank) is not currently operating, ABC Manufacturing is required to submit quarterly reports pursuant to PTI 06-07525. Since October 31, 2012, I have not received any quarterly reports for this EU. On March 18, 2013, Racheal Davies and I stopped at ABC Manufacturing to speak with you about the status of the report and also about the requested PTE evaluations for the air sources. You were not in at the time of our visit, so I left my business card with the secretary and a request for you to call me back in regards to these issues. To date, I have not received a phone call from you.

Based upon the foregoing information, ABC Manufacturing is in violation of the following:

(1) Reporting Requirements

Part I.A.2.b. of Permit 06-07525 for EU K001

The reporting requirements specified in the permit state "Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitation that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter."

ABC Manufacturing failed to submit a quarterly deviation written report for fourth quarter 2012, which was due by January 31, 2013.

Within 21 days of your receipt of this letter, please submit to this office a plan and schedule that details the company's strategy to ensure compliance with the reporting requirements in PTI 06-07525 for EU K001.

(2) Evaluation of Potential Air Sources

Ohio Administrative Code (OAC) rule 3745-15-03(A)

OAC rule 3745-15-03(A) specifies that "(A) *The director may require the keeping and periodic submission of records and reports, including but not limited to, information on air contaminants, emissions or fuel from any or all potential sources for purposes of maintaining an air pollution emission inventory or any other reasonable purpose as determined by the director. Such information shall be recorded, compiled, and submitted in a manner and form prescribed by the director.*"

On August 28, 2012, I requested that the spray paint booth and the mill be evaluated to determine whether or not a permit was needed, and that documentation of this evaluation be submitted to SEDO. On September 12, 2012, I requested that a complete PTE analysis be performed to determine whether or not the spray paint booth, mill and the powder coat wash system needed air permits.

ABC Manufacturing has failed to submit PTE evaluations of the spray paint booth, mill, and powder coat wash system.

Within 21 days of your receipt of this letter, please submit to this office the requested PTE evaluations and a plan and schedule that address the company's strategy to submit any required PTIO applications.

Failure to address these violations within the required timeframe may lead to Ohio EPA pursuing enforcement against ABC Manufacturing.

Acceptance by Ohio EPA of submitted information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you are unable to respond to any part of this request within the time frame discussed above, please contact me so that I may be of assistance. Should you have any questions or concerns, please feel free to contact me by telephone at (740) 380-5259 or via email at miki.mercer@epa.state.oh.us.

Sincerely,



Myka L. Mercer
Environmental Specialist II
Division of Air Pollution Control
Southeast District Office

MLM/cs

Enclosures

cc: Dean Ponchak, DAPC-SEDO
Bruce D. Weinberg, DAPC-CO
Brian Dickens, U.S. EPA, Region V