



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 23 2006

REPLY TO THE ATTENTION OF  
(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Kevin O'Day, EH&S Manager  
Meridian Automotive Systems  
1020 East Main Street  
Jackson, Ohio 45640

Re: Notice of Violation and Finding of Violation  
Meridian Automotive Systems  
Jackson, Ohio

Dear Mr. O'Day:

The United States Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) and Finding of Violation (FOV) to Meridian Automotive Systems (you) under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating the Ohio State Implementation Plan and Sections 502 of the Clean Air Act, 42 U.S.C. §§ 7661a, at your Jackson, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV/FOV.

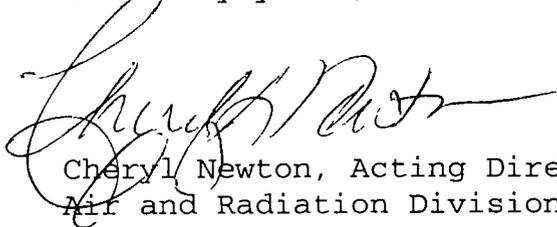
We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance

measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Nathan A. Frank, P.E, Environmental Engineer, and Susan Tennenbaum, Associate Regional Counsel. You may call them at (312) 886-3850 and (312) 886-0273, respectively, to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Cheryl Newton", written over the typed name and title.

Cheryl Newton, Acting Director  
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency

Bruce Weinberg, APC Supervisor  
Ohio EPA Southeast District Office

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:** )  
 )  
Meridian Automotive Systems ) **NOTICE AND FINDING OF**  
Jackson, Ohio ) **VIOLATION**  
 )  
 ) **EPA-5-06-OH-12**  
Proceedings Pursuant to )  
Section 113(a)(1) and (a)(3) )  
of the Clean Air Act, 42 )  
U.S.C. § 7413(a)(1) and )  
(a)(3) )  
\_\_\_\_\_ )

**NOTICE AND FINDING OF VIOLATION**

The United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation and Finding of Violation under Section 113(a)(1) and (a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1) and (a)(3). U.S. EPA finds Meridian Automotive Systems (Meridian Automotive) is violating the Ohio State Implementation Plan (SIP) and Section 502 of the CAA, 40 U.S.C. § 7661a, as follows:

**Statutory and Regulatory Background**

**Standards for Photochemically Reactive Compounds**

1. U.S. EPA approved the Ohio Environmental Protection Agency's (Ohio EPA) rules for carbon monoxide, photochemically reactive materials, hydrocarbons, and related materials at OAC 3745-21 as the federally enforceable Ohio SIP for Ozone and Carbon Monoxide on October 31, 1980 (45 Fed. Reg. 72122).
2. Among the rules approved in this action was OAC 3745-21-07(G)(2), which limits the discharge of any photochemically reactive organic compound to less than 40 pounds per day and 8 pounds per hour, unless said discharge has been reduced by at least 85 percent.

### Requirements for SIP Permits to Install

3. U.S. EPA approved Ohio EPA's permit to install (PTI) rules, OAC 3745-31, as part of the federally enforceable Ohio SIP on October 31, 1980 (45 Fed. Reg. 72119).
4. Among the rules approved in this action was OAC 3745-31-05(A)(3), which provides that the director of the Ohio EPA shall issue a permit to install (PTI) if he determines that the air contaminant source will employ Best Available Technology (BAT).
5. OAC 3745-31-01 defines Best Available Technology as any combination of work practices, raw material specifications, throughput limitations, source design characteristics, an evaluation of the annualized cost per ton of air pollutant removed, and air pollution control devices that have been previously demonstrated to the director of the Ohio EPA to operate satisfactorily in Ohio or other states with similar air quality on substantially similar air pollution sources.

### Requirements for Title V Operating Permits

6. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.
7. 40 C.F.R. § 70.1(b) provides that all sources subject to the Part 70 regulations shall have a permit to operate that assures compliance by the source with all applicable requirements.
8. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to initiate an enforcement action whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of Title V of the CAA, or any rule promulgated, issued or approved under Title V of the CAA.
9. U.S. EPA fully approved the Ohio Title V program, effective

October 1, 1995. 60 Fed. Reg. 42045 (August 15, 1995).  
Ohio's Title V permit requirements are codified at OAC  
3745-77.

**Meridian Automotive's Facility**

10. Meridian Automotive owns and operates a fiberglass reinforced composite plastic manufacturing plant 1020 East Main Street Jackson, Ohio.
11. Ohio EPA issued Meridian Automotive's Jackson plant a Title V permit on January 30, 2002.
12. From January 2001 through May 2006, Meridian Automotive operated a 60 inch sheet mold compound (SMC) machine at the Jackson plant. The SMC machine is designated as emission unit P013 in Meridian Automotive's Title V permit.
13. Emissions of photochemically reactive organic compounds from the SMC Machine are subject to the 8 lbs/hour and 40 lbs/day emission limitations in the Ohio SIP at OAC 3745-21-07(G)(2).
14. Part III, Emission Unit P013, Section A.I.1. of Meridian Automotive's Title V permit lists OAC 3745-21-07(G)(2) as an applicable requirement to the SMC machine.
15. Emissions of organic compounds from the SMC Machine are subject to an emission limitation of 1.55 lbs/hour, 24.8 lbs/day, and 2.98 tons per year pursuant to a BAT determination made in PTI 06-2470 in accordance with OAC 3745-31-05(A)(3).
16. Part III, Emission Unit P013, Section A.I.1. of Meridian Automotive's Title V permit lists the 1.55 lbs/hour, 24.8 lbs/day, and 2.98 tons per year emission limitations as applicable requirements to the SMC machine.
17. On October 19, 2005, Meridian Automotive conducted an emissions test on the SMC Machine. The emission test measured the emission rate of styrene using EPA Reference Test Methods 1 and 2 at 40 C.F.R. Part 60, Appendix A and Test Methods 204, 204D, 204F, and 205 at 40 C.F.R. Part 51, Appendix M.

18. The emissions test demonstrated a styrene emission rate of 14.71 lbs/hour from the SMC machine and an emission factor of 0.0014 lbs of styrene emissions per lb of SMC material.
19. Records of material usage combined with the emission factor developed from the October 19, 2005 emissions test show that the SMC machine emitted more than 40 pounds per day of styrene each day it operated between January 2001 and May 2006.
20. Records of material usage combined with the emission factor developed from the October 19, 2005 emissions test show that the SMC machine emitted a maximum of 141.55 lbs of styrene in a day.
21. Records of material usage combined with the emission factor developed from the October 19, 2005 emissions test show that the SMC machine had the following annual styrene emissions:

<b>YEAR</b>	<b>STYRENE EMISSIONS</b>
2001	11.58
2002	13.90
2003	12.26
2004	13.75
2005	13.23

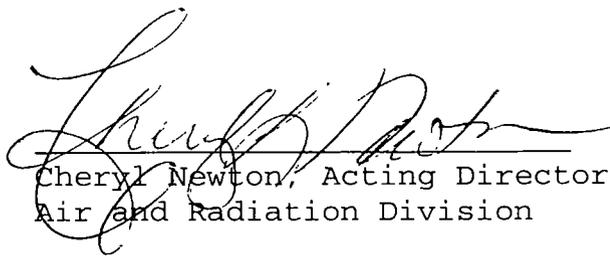
22. Styrene is a photochemically reactive organic compound.

#### Violations

23. The October 19, 2005 emission test demonstrated that Meridian Automotive's SMC Machine emitted photochemically reactive organic compounds in excess of 8 lbs/hour and 40 lbs/day in violation of OAC 3745-21-07(G)(2) from January 2001 through May 2006.
24. The October 19, 2005 emission test demonstrated that Meridian Automotive's SMC Machine emitted organic compounds in excess of 1.55 lbs/hour, 24.8 lbs/day, and 2.98 tons per year in violation of the BAT requirement of PTI 06-2470 from January 2001 through May 2006.

25. Since the emission limitations described in Paragraphs 13 and 15 above are listed as applicable requirements in Meridian Automotive's Title V permit, violations of these emission limits also constitute violations of Meridian Automotive's Title V Permit.

6/23/06  
Date

  
Cheryl Newton, Acting Director  
Air and Radiation Division

**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent a Notice of Violation/Finding of Violation, No. EPA-5-06-OH-12, by Certified Mail, Return Receipt Requested, to:

Kevin O'Day, EH&S Manager  
Meridian Automotive Systems  
1020 East Main Street  
Jackson, Ohio 45640

I also certify that I sent copies of the Notice of Violation/Finding of Violation by first class mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. 1049  
Columbus, Ohio 43216-1049

and

Bruce Weinberg, APC Supervisor  
Southeast District Office  
Ohio Environmental Protection Agency  
2195 Front Street  
Logan, Ohio 43138

on the 23 day of JUNE, 2006.



Loretta Shaffer, Secretary  
AECAS, (MN/OH)  
(312) 353-5723

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 1447 9178