



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

MAR 07 2008

REPLY TO THE ATTENTION OF:

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Toeppe, President
Wisconsin Plating Works of Racine, Inc.
620 Stannard Street
Racine, Wisconsin 53403

Re: Finding of Violation
Wisconsin Plating Works
Racine, Wisconsin

Dear Mr. Toeppe:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Wisconsin Plating Works of Racine, Inc, (you). We find that you are violating Section 112 of the Clean Air Act, 42 U.S.C. § 7412, at your Racine, Wisconsin facility.

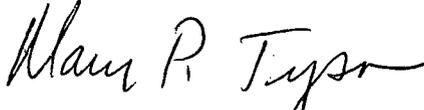
We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the 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 Constantinos Loukeris. You may call him at (312) 353-6198 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely yours,



for Cheryl L. Newton, Acting Director
Air and Radiation Division

Enclosure

United States Environmental Protection Agency Region 5

IN THE MATTER OF:)
)
Wisconsin Plating Works of Racine, Inc) FINDING OF VIOLATION
Racine, Wisconsin)
) EPA-5-08-WI-10
)
Proceedings Pursuant to)
the Clean Air Act,)
42 U.S.C. §§ 7401 et seq.)

FINDING OF VIOLATION

The U.S. Environmental Protection Agency finds that Wisconsin Plating Works of Racine, Inc. (Wisconsin Plating or you) is violating Section 112 of the Clean Air Act, 42 U.S.C. § 7412. Specifically, Wisconsin Plating is violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning at 40 C.F.R. Part 63, Subpart T as follows:

Regulatory Authority

1. Pursuant to Section 112(d) of the Clean Air Act, on December 2, 1994, EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 59 Fed. Reg. 61801. These regulations were final on December 2, 1997 and are codified at 40 C.F.R. Part 63, Subpart T, §§ 63.460 - 63.471.
2. The NESHAP for Halogenated Solvent Cleaning applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

3. The NESHAP, at 40 C.F.R. 63.463(e)(1), states that each owner or operator of a solvent cleaning machine shall conduct monitoring of each control device used to comply with § 63.463 of this subpart as provided in § 63.466.
4. The NESHAP, at 40 C.F.R. 63.463(e)(2)(i), states that if a freeboard refrigeration device is used to comply with these standards, the owner or operator shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
5. The NESHAP, at 40 C.F.R. 63.466(a), states that except as provided in paragraph (g) of this section, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in §63.463(b)(1)(i), (b)(2)(i), (c)(1)(i), (c)(2)(i), (g)(1), or (g)(2) shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraphs (a)(1) through (5) of this section.
6. The NESHAP, at 40 C.F.R. 63.466(a)(1), states that if a freeboard refrigeration device (FRD) is used to comply with these standards, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

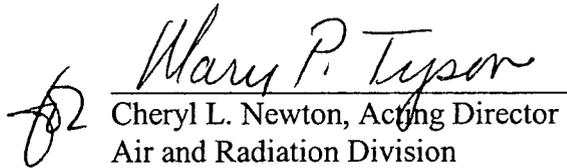
Wisconsin Plating's Facility

7. Wisconsin Plating owns and operates a vapor degreaser at 620 Stannard Street in Racine, Wisconsin.
8. Wisconsin Plating's vapor degreaser, Emission Unit P35, uses trichloroethylene in a concentration greater than 5 percent by weight; therefore Emission Unit P35 is subject to the requirements at 40 C.F.R. Part 63 Subpart T.
9. On July 18, 2007, Wisconsin Plating submitted their semi-annual report for the NESHAP, indicating there were six (6) occurrences where the temperature of the FRD was not recorded.

Violations

10. Wisconsin Plating failed to monitor and record the temperature of the FRD for Emission Unit P35 for the six week listed below. This is a violation of 63.463(e)(1) and 63.466(a).

Date: 3/07/08


Cheryl L. Newton, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Shanee Rucker, certify that I sent a Finding of Violation, No. EPA-5-08-WI-10, by Certified Mail, Return Receipt Requested, to:

Robert J. Toeppe, President
Wisconsin Plating Works of Racine, Inc.
620 Stannard Street
Racine, Wisconsin 53403

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

Ted Cauwels
Wisconsin Department of Natural Resources
SER – Sturtevant Service Center
9531 Rayne Road Suite 4
Sturtevant, Wisconsin 53177

on the 7 day of March, 2008.


Shanee Rucker, Secretary
AECAS, (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000601877109