



State of Ohio Environmental Protection Agency

Southwest District

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Certified Mail

March 18, 2008

Mr. Robert G. Hooper
Operations Manager
Protec Pac
456 South Stolle Avenue
Sidney, Ohio 45365

Notice of Violation

Re: Failure to achieve the proper capture efficiencies of the process emissions for both emissions units P001 and P002, Foam Extrusion lines 1 and 2, respectively, in accordance with the Permit to Install application and emission calculations submitted by Protec.

Dear Mr. Hooper,

Based on the results of the October 2007, stack tests on emissions units P001 and P002, it is clear the present equipment design, capacity, and/or materials being employed can not achieve the capture or overall emission reduction efficiencies that were the basis on your Permit to Install (PTI) 05-14396 application and emission estimates.

The failure to adequately capture the process organic compound (OC)/ volatile organic compound (VOC) emissions from emissions units P001 and P002 constitute violations of Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) and possible compliance concerns, based on potential emissions, with the requirements of the Title 40 Code of Federal Regulations (CFR) Part 52, the Prevention of Significant Deterioration (PSD).

In order to assure quick response to this failure and assure that the emissions from Protec's Sidney, Ohio, are minimized, please submit the following information to this office:

- A review of the Actual OC/VOC emissions based on a rolling 12-month period, since the initial startup day of emissions unit P002, Foam Line 2;
- A list of interim steps that Protec has taken and will take to assure that the emissions from the individual emissions units as well as the overall facility are minimized and do not constitute a toxics problem;
- A compliance schedule for modifying the emissions units at this facility in order to achieve and demonstrate compliance with all applicable State and Federal air regulations.

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Overall facility-wide OC/VOC emissions:

Please submit a report to this office reviewing the overall OC/VOC emissions from your facility since the initial operation of emissions unit P002. This report should demonstrate the rolling 12-month OC/VOC emissions from each emissions unit at this facility and the overall rolling 12-month OC/VOC emissions from the facility. The report shall outline and demonstrate the actual equipment and method for justifying any and all capture and/or control efficiencies used in the calculations.

Interim steps to minimize and/or eliminate OC/VOC emissions from this facility:

Please submit a report to this office that will demonstrate how the overall emissions will be minimized or eliminated during this period of operation. Under PTI 05-14396 all four emissions units trigger the "Ohio Toxic Policy". The interim steps outlined in this report should include and address compliance with Section "B" "State Only Enforceable Section", and should demonstrate and assure there are no existing violations of the "Ohio Toxics Policy" as it is outlined in PTI 0514396.

A compliance schedule:

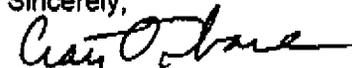
Please submit a compliance schedule for assuring and demonstrating that the emissions units at this facility are in compliance with all applicable State and Federal air pollution regulations. The compliance schedule should include milestones that will demonstrate continuous and proactive steps to address that emission concerns at this facility.

Please be aware that this letter or your response does not constitute waiver of this office's ability to send an Enforcement Action Referral (EAR) to our Central Office for further review and possible enforcement action. The Ohio EPA reserves the right, pursuant to Chapters 3704, 3714, 3734, 3745, and 3750 of the Ohio Revised Code and any other applicable state or federal laws or regulations to seek civil and/or criminal action, reimbursement of response costs and any other appropriate legal or equitable relief for any violation of law.

Please submit to this office, by April 18, 2008, the above requested reports and compliance schedule.

If you have any questions and/or concerns, please feel free to contact me at (937) 285-6063.

Sincerely,


Craig Osborne

cc: Tom Schneider, DAPC/ SWDO
John Paulian, DAPC /CO
Lisa Holscher U.S. EPA, Region V

CO/plh