



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

April 22, 2009

CERTIFIED MAIL

Mr. Steve Newell, Vice President of Operations  
Denman Tire Corporation  
400 Diehl South Road  
Leavittsburg, OH 44430

027800013

Dear Mr. Newell:

Please consider this letter as a retraction to the Notice of Violation letter sent to Denman on February 27, 2009. Denman's fourth quarter report listed an exceedence of the cumulative permit limit for HCl emission, which is a hazardous air pollutant (HAP). Denman is limited to 10 tons per year of an individual HAP. The report stated HCl emissions to be 15.5 TPY based on the calculation for HCl in your Title V permit.

A mistake was made in calculating HCl emissions. The formula called for calculating HCl based on the chlorine content in coal reported as a chlorine ion with a molecular weight of 35.5. Denman's coal laboratory was reporting the content in terms of Cl<sub>2</sub> which has a molecular weight of 70.09.

To avoid this problem in the future, please have your laboratory or any other laboratory you use in the future report the chlorine content in terms of diatomic chlorine, Cl<sub>2</sub>. Also, please alter your formula to use the molecular weight of Cl<sub>2</sub>, 70.09.

Your corrected HCl emissions report of April 16, 2009, showed the 12-month rolling average of HCl to be 9.18 tons. This is also getting close to the 10 ton limit. As I stated in my previous letter, the chlorine content of your coal has been increasing steadily since last year. Therefore, Denman should continue to submit a monthly report containing the HCl emissions from the coal boiler, B001, for the previous month; an updated 12-month summation of HCl emission; copies of coal analysis containing chlorine content in parts per million; and the calculations of the monthly HCl emissions. Denman may request to discontinue this report once the 12-month summation of HCl falls below seven tons.

If you have any questions, please feel free to contact me at (330)963-1243.

Sincerely,

Robert Goulish  
Environmental Engineer  
Division of Air Pollution Control

RG:bo

pc: Tim Boyer, Denman Tire  
Tim Fischer, DAPC, NEDO  
Tom Kalman, OEPA, CO  
Lisa Holscher, USEPA, Region V  
Edward Trenn, HzW Environmental