



**Environmental
Protection Agency**

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

March 28, 2011

CERTIFIED MAIL

Mr. Tim Sheehan
REFCOTEC, Inc.
542 Collins Blvd.
Orrville, OH 44667

RE: Warning Letter for Operating Emissions Unit P002 Prior to Applying for Permits-to-operate (PTOs); Ohio EPA Facility ID # 02 85 01 0376

Dear Mr. Sheehan:

The purpose of this letter is to notify you that REFCOTEC, Inc. is operating emissions unit P002 in violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(c) "permits-to-operate" and Ohio Revised Code (ORC) 3704.05(G). This matter was brought to my attention while reviewing the files for REFCOTEC, Inc. at this office on March 21, 2011.

According to the information submitted by REFCOTEC, Inc., emissions unit P002 (a 12,000 lbs mixing line, mixer #7, including two 750-gallon batch tanks, used alternatively; emissions are controlled by two parallel cartridge collectors), began operating at least in 2009 or earlier. Ohio EPA's Division of Air Pollution Control (DAPC) issued PTI 02-22838 to REFCOTEC, Inc. for installation of emissions unit P002 on December 20, 2007. However, to this date, no applications for PTOs have been submitted. Therefore, REFCOTEC, Inc. has been operating air contaminant source P002 in violation of OAC Rule 3745-31-02.

Since 2008, DAPC has changed to a system consisting of permit-to-Install and Operate (PTIO). In order to move toward compliance, please submit PTIO applications to my attention at the Northeast District Office for emissions unit P002 **within thirty (30) days of receipt of this letter**. Blank application forms are enclosed for your convenience. Please feel free to make copies as needed. Failure to respond to this request in the stated time frame can result in a referral to the Central Office of Ohio EPA for the appropriate enforcement action.

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The submission of the requested permit application does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Should you have any questions, please feel to call me at (330) 963-1174 or e-mail tracy.gu@epa.state.oh.us

Sincerely,



C. (Tracy) Gu
Environmental Specialist
Division of Air Pollution Control

TG:bo

enclosure

pc: Tim Fischer, Ohio EPA, NEDO, DAPC