



**Environmental
Protection Agency**

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

Re: Hancock County
0332010003
Cooper Tire and Rubber Company
Stack Test
HPV-GC8
Notice of Violation

December 1, 2011

CERTIFIED MAIL

Mr. Jeremy Lamb
Cooper Tire and Rubber Company
701 Lima Avenue
Findlay, Ohio 45840

Dear Mr. Lamb:

The stack test conducted on September 30, 2011, on emissions unit P137 (Banbury Mixer 3) has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

**Critical Test Data
(In Three Run Averages)**

	PM
1. Actual Emission Rate:	0.187 lb/hr
2. Allowable Emission Rate:	0.15 lb/hr
3. Source Operating Rate:	9701.5 lbs/hr
4. Maximum Source Operating Rate:	10829.7 lbs/hr

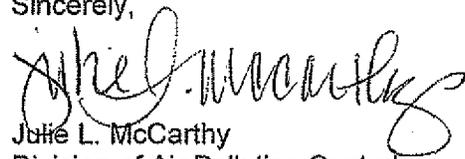
The emissions unit was being operated in violation of its allowable emissions rate for PM (violation of the Title V permit term and condition C.10(b)(1)(a), OAC rule 3745-31-05(A)(3) and Ohio Revised Code 3704.05). Also, the emissions unit was only being operated at 89.6% of its maximum source operating rate. The Ohio EPA cannot accept compliance testing at less than the maximum source operating rate. For these reasons, it will be necessary to retest this unit or take other appropriate action to achieve compliance.

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information no later than December 29, 2011. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Mr. Jeremy Lamb
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Please contact me at (419) 373-3115 if you have any questions or comments regarding this letter.

Sincerely,



Julie L. McCarthy
Division of Air Pollution Control

/lir

pc: Julie McCarthy, DAPC-NWDO
Robert Teer, DAPC-NWDO
Tom Kalman, DAPC-CO
Lisa Holscher, US EPA
DAPC, NWDO Stack File
Follow-up File
Certified Mail Receipt Number 7009 1410 0001 1834 1880

ec: Jay Liebrecht, DAPC-NWDO
Mark Budge, DAPC-NWDO
Jennifer Jolliff, DAPC-NWDO
Robert Teer, DAPC-NWDO
Tom Sattler, DAPC-NWDO