



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

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www.rapca.org

November 14, 2007

### Certified Mail

Max Lake

President

Pyrograf Products, Inc.

154 West Xenia Avenue

Cedarville, OH 45314

### WARNING LETTER

Dear Mr. Lake:

On October 17, 2007, the Regional Air Pollution Control Agency (RAPCA) performed a compliance inspection of Pyrograf Products (Ohio ID: 0829040591) located at 154 West Xenia Avenue, Ohio. Pyrograf Products operates P001 - Carbon Nanofiber Production Reactor A with Flare, P002 - Carbon Nanofiber Production Reactor B with Flare, and P003 - Fiber Drying Unit. P001 and P002 are permitted under Permit to Install (PTI) 08-04670 issued March 22, 2005. P003 is permitted under PTI 08-04685 issued on June 28, 2005. During the October 17, 2007 inspection, RAPCA documented the following violations:

#### I. Failure to operate P001 and P002 with Flare

Term B.1 of PTI 08-04670 for P001 and P002 requires that a pilot flame be maintained at all times in the flare's pilot light burner. During the October 17, 2007 inspection, no pilot flame was present and the flare was inoperable. Pursuant to term A.1, P001 and P002 are each limited to 2.6 pounds per hour (lbs/hr) and 11.2 tons per year (TPY) methane. This limit is based on the a 90% control efficiency associated with operating the flare. Without the use of the flare, Pyrograf Products may be exceeding their allowable TPY methane limit. Failure to operate the required control device is a violation of PTI 08-04670 and Ohio Revised Code (ORC) 3704.05.

#### II. Failure to maintain records for P001 and P002

Term C.1 of PTI 08-04670 for P001 and P002 requires that Pyrograf Products install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

Term C.2 of PTI 08-04670 for P001 and P002 requires that Pyrograf Products record the following information each day:

1. all periods during which there was no pilot flame
2. the operating times for the flare, monitoring equipment, and the associated emissions unit.

Failure to maintain the required records is a violation of PTI 08-04670 and Ohio Revised Code (ORC) 3704.05.

**III. Failure to submit deviation reports for P001, P002, and P003**

Term D.1 of PTI 08-04670 for P001 and P002 requires that Pyrograf Products submit quarterly deviation reports that identify all periods during which the pilot flame was not functioning properly.

Term D.1 of PTI 08-04685 for P003 requires that Pyrograf Products submit quarterly deviation reports identifying each day during which the organic compound (OC) emissions from the coatings and photochemically reactive cleanup materials exceeded 20 pounds per day and the actual OC emissions for each such day.

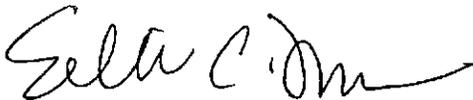
These quarterly reports are required to be submitted by January 31, April 30, July 31, and October 31 of each year. To date, no reports have been received by RAPCA. Failure to submit the required reports is a violation of PTI 08-04670, PTI 08-04685, and ORC 3704.05.

A review of RAPCA's files indicates a history of non-compliance at this facility regarding the operation of the flare and the submittal of required reports. On September 28, 2004, RAPCA performed a compliance inspection and determined the facility was not operating the flare as required. On November 15, 2004, RAPCA requested that Pyrograf Products submit a plan to bring the facility into compliance. On January 6, 2005, RAPCA received the compliance plan which indicated that the flare would be brought online by June 10, 2005.

On December 16, 2005, RAPCA sent Pyrograf Products a letter noting that no quarterly reports had been submitted since the PTI 08-04685 and PTI 08-04670 were issued and requesting the facility to submit all delinquent reports. No response was received by RAPCA.

At this time, RAPCA is requesting that Pyrograf Products submit a compliance plan to bring the facility into compliance with all requirements. At the least, this plan shall include a schedule to begin operating the flare, a plan to maintain required records, submitting all delinquent quarterly reports, and a determination of the actual methane emissions from P001 and P002 on an annual basis since each unit was installed. This compliance plan shall be submitted within 30 days of receipt of this letter. If you have any questions regarding this matter, please contact me at 937-225-4004.

Sincerely,



Eileen C. Moran  
Air Pollution Control Specialist

cc: Lisa Holscher, USEPA  
Tom Kalman, OEPA  
Jeff Canan, RAPCA

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

Max Lake  
 President  
 Pyrograf Products, Inc.  
 154 West Xenia Avenue  
 Cedarville, OH 45314

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Max Lake  
 President  
 Pyrograf Products, Inc.  
 154 West Xenia Avenue  
 Cedarville, OH 45314

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