



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Ashland County
RadTech, Inc.
692 US Route 224
Nova, OH 44859
Premise #0303010170
Notice of Violation (NOV)

Certified Mail

October 23, 2008

Mr. Matt Reineke, Vice President
Americarb
1025 Faultless Drive
Ashland, Ohio 44805

Mr. Reineke:

On September 15, 2008, the Division of Air Pollution Control (DAPC), Northwest District Office (NWDO) conducted a visit of the above referenced facility by Ms. Jennifer Joliff and Mr. Brian Riedmaier. A second visit held on October 16, 2008 was initiated by Mr. Riedmaier and this writer and was attended by Mr. Kent McManus and Mr. T. Donald Pinto, both with Malcolm Pirnie, Inc., Mr. David Scheub, Jeff from the NY branch of the facility, Mr. Edward Perkins with Americarb and yourself.

The purpose of the site visit was to determine the compliance status of the air contaminant sources at the facility as well as to complete the investigation of a complaint received on September 5, 2008. The records indicate that this facility has not been inspected by DAPC prior to these site visits.

Based on our discussions and observations during the two visits, the findings can be summarized as follows:

1. During the inspection, it was observed that the facility operates three heat induction furnaces and one graphitization furnace. The graphitization furnace was issued a Permit to Install (PTI) on April 8, 1998 (PTI #03-11085). It is identified as emission unit number P004. The three heat induction furnaces were permitted under PTI #03-13155 issued on March 3, 1999 and identified as emission unit numbers P005, P006 and P007.
2. PTI #03-11085 also permitted the installation of three car bottom carbonizing kilns. These kilns were installed but none of these kilns have ever been operational. Instead, the facility installed and operated two smaller-size kilns that are not permitted. The installation and operation of these two kilns is a violation of Ohio

Administrative Code (OAC) rules 3745-31-02 and 3745-35-02 and Ohio Revised Code (ORC) 3704.05.

These kilns have recently been moved to another facility, Americarb, temporarily and are being used there. These kilns were viewed during a tour of the Americarb facility on October 16th. Americarb is in violation of having installed and operated these kilns pursuant to OAC rules 3745-31-02 and 3745-35-02 and ORC 3704.05.

Americarb is therefore required to submit a Permit to Install and Operate (PTIO) application for these two kilns. Also witnessed during the tour of the Americarb facility are three ovens where two are natural gas-fired and one is electric. It is necessary that the facility provide potential emission calculations from each of the ovens to determine if there are any permit requirements.

3. High temperature graphitizing furnace (P004) is permitted to emit 0.95 pound of sulfur dioxide emissions per hour and 4.20 tons of sulfur dioxide per year. As discussed, we recommend that the facility submit an emissions inventory and a PTIO application for this source. It is certain that there would also be particulate emissions and potentially carbon monoxide emissions from this emissions unit in addition to sulfur dioxide.
4. The three electric induction bake furnaces identified as P005, P006 and P007 were issued PTI #03-13155. This permit requires the permittee to maintain monthly records of the operating hours of the three emission units. The permittee is also required to maintain monthly records of sulfur used in each of the emission units. The permittee is required to submit deviation reports that identify all exceedances of the rolling, 12 month operating hours limitation. The company has been, and continues to be, in violation of not complying with the monitoring, recordkeeping and reporting requirements identified in PTI #03-13155.

During the visit, the company provided an emission calculation sheet that listed the maximum operating hours of the furnaces. P004 and P006 each operate for a maximum operation of 110.77 hours per month (1329 hours per year). P005 and P007 each operate a total of 109.83 hours per month (1317.97 hours per year). However, the current PTI for P004 does not limit the number of hours of operation and the annual operational hours of P005 through P007 are limited to 1500 hours even though none the furnaces can operate more than 1329 hours. The company is thereby required to submit an emissions inventory and a PTIO application for the three electric induction furnaces.

5. The company is planning to install a new furnace at the facility. During the tour of the plant, it appeared that some parts of the furnace were already at the facility. Therefore, the company is required to submit a PTIO application for this new emissions unit prior to its installation.
6. The company is operating an emergency generator. This emissions unit is not exempt from the rules and regulations of DAPC. This unit does however qualify for a Permit by Rule in accordance with OAC rule 3745-31-03(4)(b). Therefore, the company is to submit a PBR application for this unit that can be found at <http://www.epa.state.oh.us/dapc/pbr/permitbyrule.html>.

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7. The facility has been operating roadways that are unpaved. Emission calculations are necessary for this emissions unit to determine whether a PTIO is required or whether this emissions unit is de minimis pursuant to OAC rule 3745-15-05.
8. It was indicated during the second visit that the facility plans to bring in a thermal oxidizer as control equipment to the emissions from the induction furnaces. It was noted that the formulation would be changed from the current existing type thereby necessitating control. Any change would require a permitting action prior to the installation or modification of the existing process.
9. Mr. Riedmaier is the DAPC contact for both RadTech, Inc. and Americarb. All reports and questions concerning these two facilities can be directed to Mr. Riedmaier's attention. His contact information is Brian.Riedmaier@epa.state.oh.us or (419) 373-3110.

The Ohio EPA has a Small Business Assistance Office that can be contacted for free and confidential assistance with this process. This office may be able to assist you in coming into compliance with the rules and regulations of the DAPC. Additional information can be found at their website, <http://www.epa.state.oh.us/ocapp/ocapp.html> or by calling the Office of Compliance Assistance and Pollution Prevention (OCAPP) at 1-800-329-7518 or (419) 373-3147.

NWDO requests that the company submit the information detailed above by no later than December 12, 2008. Please be advised that the submission of information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to Ohio Revised Code Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

I would like to thank you for the courtesy and cooperation that was extended during the visits. If you have any questions and/or comments about this letter, please feel free to contact me at mohammad.smidi@epa.state.oh.us or (419) 373-3118.

Sincerely,



Mohammad Smidi
Environmental Specialist

/lb

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10/23/08 Rad Tech Inc

0303010170

05 PC - 03 LB

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