



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Defiance County
Johns Manville - Plant 2 and 8
Premise #'s 0320010003,
0320010005
Notice of Violation Close-out/HPF

August 30, 2007

Mr. Dick Bonin
Johns Manville - Plant 2 and 8
925 Carpenter Road
Defiance, Ohio 43512

Dear Mr. Bonin:

The Division of Air Pollution Control (DAPC) has reviewed Johns Manville's letters dated June 22, and August 14, 2007, which contained responses to DAPC's May 9, Notice of Violation (NOV). The NOV was issued for the failure to adhere to the startup and shutdown of emission units according to the Defiance Consolidation Time Line Schedule submitted with the application for PTI # 03-17015. According to PTI # 03-16294, (PIPE) the company also failed to conduct visible emission checks on the following emission units: P060, P073 - P086, since startup of these PIPE insulation lines.

The response letters included a revised Defiance Consolidation Time Line Schedule which incorporated the delays in the startup of PIPE insulation lines and the resultant delays also caused delays in the construction activities associated with the Consolidation PTI. Both PTI's are considered "related projects" for PSD purposes and based on the information submitted by the company, actual emissions have remained below PSD significance levels. Since it is impractical to modify the PTI's and incorporate revised schedules, Johns Manville has also committed to update this time line every six months; or more frequently if deemed necessary to keep our office aware of the status of the project.

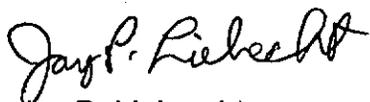
The misunderstanding of what constitutes "startup" of an emissions unit has also been cleared up. Johns Manville's response letters included copies of the Visible Emission Inspection Log for PIPE. These logs document that the company began recording the required visible emission checks on April 20, 2007, for all of the emission units associated with the PIPE PTI.

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The Ohio EPA has reviewed the revised Defiance Consolidation Time Line Schedule and Visible Emission Inspection Logs for PIPE and found the responses to be acceptable. No further action is being taken at this time for the violations cited in the May 9, 2007, NOV and the violations are considered resolved.

Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,


Jay P. Liebrecht
Environmental Specialist

/llr

pc: Don Waltermeyer, DAPC, NWDO
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