



Environmental
Protection Agency

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

Re: Paulding County
Systech Environmental Corporation
03 63 00 0046
WARNING LETTER

July 11, 2011

CERTIFIED MAIL

Mr. Jeff Hunyor, Facility Manager
Systech Environmental Corporation
P. O. Box 266
11397 County Road 176
Paulding, Ohio 45879

Dear Mr. Hunyor:

This letter addresses the reporting deficiency documented in the facility's Title V permit Annual Compliance Certification (CC) for calendar year 2010. The deficiency was that annual organic compound (OC) emissions were not reported as required by Permit to Install (PTI) 03-13006, for calendar years 2008, 2009, and 2010. Generally, the agency concurs with the company's approach for resolution of the compliance issues, with some exceptions and/or additions. The following items should be addressed:

1. The company will need to submit a revised CC for calendar years 2009 and 2008, to reflect the OC reporting deficiency, for each of those years.
2. The company's attached letter for the 2010 CC states "Those [Fee Emission Reports - FERs] are available for the years in question and substantiate the information contained herein", but only a 'less than one ton' default designation is included, for the FERs for the sources in question (emissions units T010 and T011). The company will need to follow through and submit OC emissions report(s) /summary(ies) for calendar years 2008, 2009, and 2010.
3. Also in the attached letter, the company is requesting an administrative modification to the PTI, to provide for future FER reporting to suffice for the annual reporting requirement for the PTI. This is acceptable; however, the company must report actual numbers of the emissions estimates (i.e. not simply "less than one ton"). The company must apply through Air Services for the PTI administrative modification.

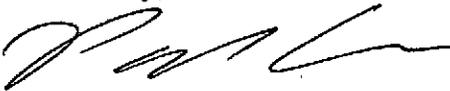
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These items should be completed by July 15, 2011. The company should also look ahead to April 2012, to note the late submission of the 2010 calendar year OC report, in its CC for calendar year 2011.

Please be advised that the submission of information to respond to this letter does not constitute waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should the company have any questions and/or comments, I may be reached at (419) 373-3117. I may also be contacted electronically by E-mail at: paul.chad@epa.state.oh.us

Sincerely,



Paul Chad
Division of Air Pollution Control

/lr

ec: Jennifer Jolliff, DAPC NWDO
Certified Mail Receipt Number 7009 1410 0001 1840 2888

pc: DAPC NWDO File