



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Newman Technologies, Inc.
Premise # 03.70.01.0118
Notice of Violation

February 6, 2008

CERTIFIED MAIL

Mr. Jared Kirk, Safety Specialist
Newman Technologies, Inc.
100 Cairns Road
Mansfield, Ohio 44903

Dear Mr. Kirk:

This letter shall serve as both a follow-up to Newman Technologies, Inc.'s (NTI) January 8, 2008, letter in response to the Division of Air Pollution Control's (DAPC) December 12, 2007, Notice of Violation (NOV) and as a notification that additional violations have been discovered at the above referenced facility. In our December 12, 2007, NOV, DAPC requested information from NTI regarding its flocking line, a coating operation where the company employs solvent based adhesives. Based on the information supplied by NTI and its coating suppliers, the following additional violations have occurred:

NTI installed and operated an air contaminant source (the flocking line) around February of 2006, without obtaining the appropriate Permit to Install (PTI) and Permit to Operate (PTO). These are violations of Ohio Administrative Code (OAC) rule 3745-31-02(A) and OAC rule 3745-35-02(A) respectively. Failure to obtain these permits is also a violation of Ohio Revised Code (ORC) 3704.05.

The first step in correcting these violations is to submit complete PTI and PTO applications for our review. This review will determine if any additional violations occurred. We request they be submitted by no later than March 10, 2008.

In our December 12, 2007, NOV, NTI was cited for a violation of the total enclosure requirements in PTI 03-13976, Part II.B.3 for emissions unit K001. Since then, NTI has taken some steps to correct this violation. However, it is DAPC's understanding that this emissions unit remains in violation of this PTI requirement.

In its January 9, 2008 response, NTI merely stated that compliance with the required pressure differential will be achieved by March 31, 2008.

Mr. Jared Kirk, Safety Specialist
February 6, 2008
Page 2

Please provide a more detailed description of the measures that have been taken, to date, and the measures that have yet to be taken to bring this emissions unit back into compliance and to maintain its compliance thereafter. Also, please provide written notification when K001 is brought back into compliance.

Please note that the submission of information to respond to this letter does not constitute a waiver of 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.

If the company has any questions and/or comments concerning this letter, please contact me at the above address or call (419) 373-3137 or electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/llr

pc: Lisa Holscher, U.S. EPA Region V
Tom Kaiman, DAPC - GC
Don Waltermeyer, DAPC - NWDO
Samir Araj, DAPC - NWDO
Thomas C. Cikotte, DAPC - NWDO
~~DAPC-NWDO Inspection File~~