



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Richland County
Newman Technologies, Inc.
Premise # 03.70.01.0118
**Notice of Violation/High Priority
Facility**

December 12, 2007

CERTIFIED MAIL

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

Dear Mr. Kirk:

This letter shall serve as follow-up to the inspection conducted on December 6, 2007, of the above-referenced facility by Mr. Mohammad Smidi and myself of Ohio EPA's Northwest District Office (NWDO). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located at Newman Technologies, Inc. (NTI).

Based on our discussions, our observations during the inspection, and a review of the company's files, our findings are as follows:

1. T001 and T002, two fuel storage tanks, were removed from the facility on or about July 2007. They were replaced with two above ground storage tanks. Please submit the NTI identification of these tanks and the tank volume to this office.
2. NTI installed a coating operation, which it calls the "Flock Line". Please submit the following information regarding this coating line: Installation date of the unit; Adhesive usage records for the last 12 months; material safety data sheets data sheets and/or technical data sheets which show VOC content the for all coatings, adhesives and clean-up materials employed in this operation, and; calculations which show the potential to emit and actual emission for this operation.
3. Per PTI 03-13976, Part II.B.3, the permanent total enclosure for K001 must be maintained at a pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation. NTI has submitted quarterly deviation reports (2nd and 3rd quarter 2007) stating that there was a problem with the pressure differential, that the issue had been resolved and that the emissions unit was in compliance. While on site, the pressure differential was observed to be less than 0.007 inches of water. NTI's records show repeated deviations from this specification in the past. This is a violation of the operational restrictions of PTI 03-13976, which is a violation of Ohio Administrative Code (OAC) 3745-31-05(A)(3) and Ohio Revised Code 3704.03.

4. Per PTI 03-13976, Part II.D.1.b and the General Terms and Conditions, NTI is to submit a quarterly deviation report which identifies all 3-hour blocks of time during which the permanent total enclosure for K001 was not maintained at the required differential pressure specified in Part II.B.3: Quarterly deviation reports were submitted to NWDO which stated that a problem existed at the facility regarding the differential pressure; however, the blocks of time where the differential pressure was out of compliance was not submitted. This is a violation of the reporting requirements of PTI 03-13976.
5. Per PTI 03-13976, Part II.C.3, NTI is required to maintain monthly records of the following for emissions unit K001: the identity of each coating and clean-up material employed; the number of gallons of each coating and clean-up material employed; the organic content of each coating and clean-up material employed; the total organic emissions rate for all coatings and clean-up materials, in lbs/month; and the annual year-to-date emissions for all coatings and clean-up materials. NTI was not able to provide all those records for most dates in calendar year 2007 and acknowledged that the records have not been at all kept since, at least, May of 2007. This is a violation of the monitoring and recordkeeping requirements of PTI 03-13976.

The facility has 30 days to respond in writing to Ohio EPA with a compliance plan to remedy the observed situations and prevent this, or any similar such situation, from occurring in the future. 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.

Thank you for taking the time to accommodate our schedule at the time of our visit. 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 Kalman, DAPC - CO
Don Waltermeyer, DAPC - NWDO
Samir Araj, DAPC - NWDO
~~Thomas C. Cikotte, DAPC - NWDO~~
DAPC-NWDO Inspection File