



State of Ohio Environmental Protection Agency

Northwest District Office

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

December 24, 2008

CERTIFIED MAIL

Mr. Ken Holland, President
Olen Corporation
4755 S. High Street
Columbus, Ohio 43207

Subject: Notice of Violations (NOV) and request for information regarding
Woodville Enterprise, LLC (0372000104).

Dear Mr. Holland:

It has come to the attention of the Ohio EPA, Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) that Olen Corporation (Olen) has entered into a business agreement with Woodville Enterprise, LLC (Woodville) and now owns 51% of this facility. The purpose of this letter is to request further information regarding this transfer of ownership and to notify Olen of current violations associated with the facility. In addition, this office also received a letter from Synsil Products, Inc. (Synsil) on July 17, 2008, stating that Woodville had purchased this facility and requested all permits issued to Synsil be transferred to Woodville. Further information pertaining to this transfer of ownership is also being requested at this time.

The NWDO was contacted on October 10, 2008, by Ms. Ginger Edmonds (representing Woodville) regarding the business agreement between Olen and Woodville. Ms. Edmonds did not have much information regarding the ownership change and indicated that someone from Olen would likely contact this office with further details. No further contact was made with this office, so on November 6, 2008, Brian Riedmaier and this writer conducted a site visit to try to obtain the details of the ownership change and look at records since Ms. Edmonds also indicated that Woodville had begun mineral extraction and aggregate processing operations.

Permit to Install (PTI) 03-17296 was issued on April 12, 2007, for aggregate processing (emissions unit F003) and mineral extraction (emissions unit F004) operations. The PTI outlines specific control, monitoring and recordkeeping requirements for both emissions units.

Mr. Jim Bischoff met with us during our visit and was not able to produce any records for these operations documenting the company was properly controlling fugitive dust emissions, nor was he aware that any were being kept. Failure to maintain proper records is a violation of the terms and conditions of the permit and ORC 3704.05. Additionally, a review of our files show that Woodville did not submit deviation reports for third quarter 2008 as required by the PTI and Permits to Operate for roadways and storage piles.

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In order to resolve these violations, the company must review PTI 03-17296 and immediately initiate control, monitoring and recordkeeping as required by the permit for these operations. The company must submit a copy of any forms that will be used to record data as well as identify who will be responsible for performing the required control, monitoring and recordkeeping. In addition, the third quarter 2008 report must be submitted and should identify deviations for failing to maintain the required records. This information must be submitted by January 13, 2009.

In regards to the transfer of ownership, a written notification must be submitted including the following information in order for this office to update our records:

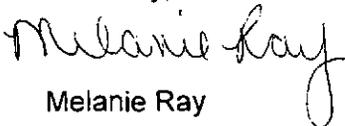
- Former facility name
- New facility name
- New facility contact, mailing address and phone number
- Date of ownership transfer

As mentioned above, this office was notified in July of the sale of Synsil Products Inc. to Woodville Enterprise. A request was made at this time to transfer all permits associated with Synsil to Woodville. Before any permits will be transferred, the NWDO would like an explanation from the company of planned uses for the Synsil facility and associated equipment.

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 this writer at (419) 373-4111 or email melanie.ray@epa.state.oh.us.

Sincerely,



Melanie Ray
Division of Air Pollution Control

/l/r

pc: Don Waltermeyer, DAPC-NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, USEPA, Region 5, Air and Radiation Division
NWDO follow-up file
~~DAPC-NWDO Sandusky County correspondence file~~

ec: Brian Riedmaier, DAPC-NWDO

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 MR KEN NOLLAND, President
 CLEAR CORPORATION
 4735 S. HILL STREET
 Columbus, OHIO 43207

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
 X *May J. Bebest*

B. Received by (Printed Name) / C. Date of Delivery
May J. Bebest / *12-1-04*

D. Is delivery address different from item 1? Yes No
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