



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: Williams County  
Titan Tire Corporation  
Premise # 03 86 01 0003  
**Notice of Violation/HPF**

Certified Mail

October 11, 2007

Tom DeNoi, Operations Manager  
Titan Tire Corporation  
927 South Union St.  
Bryan, OH 43506

Dear Mr. DeNoi:

Based on an article in the Toledo Blade on September 28, Titan Tire has begun construction of a 250,000 square foot expansion to manufacture 63 inch tires. Per our meeting with Gazi George with Titan Tire on October 4, the Ohio EPA Northwest District Office (NWDO) Division of Air Pollution Control (DAPC), has confirmed that Titan Tire has begun construction of the project, and is currently finalizing the PTI application.

According to recent correspondence, Titan Tire's potential to emit (PTE) for the facility was 433 tons of VOC's, and 566 tons of SO<sub>2</sub>. The existing tire assembly area (P006) accounts for 275 tons of the VOC's, while the green tire spray booth (R002) has a PTE of 124 tons of VOC's. Nearly all of the potential SO<sub>2</sub> emissions are from boiler #3 (B003) permitted firing #6 fuel oil. Therefore, Titan Tire's Bryan plant is considered a "major facility" in an attainment area.

Based on the PTE calculations forwarded for the new tire expansion project during the meeting, the PTE for VOC's will be greater than 90 tons, which exceeds the 40 ton significance level for VOC's, and constitutes a "major modification" under OAC rule 3745-31-01. Therefore, the Ohio EPA has determined that Titan Tire is in violation for beginning the construction of air pollution sources without obtaining the proper PTI's. This is a violation of the Major New Source Review permitting requirements, (PSD rules in 40 CFR 52.21), OAC rule 3745-31-13, and ORC 3704.05.

Per our discussions during the meeting, the company will need to submit a PSD permit application and obtain the permit for the tire expansion project in order to resolve this violation.

Mr. Tom DeNoi  
 October 11, 2007  
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Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 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 you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,

*Jay P. Liebrecht*

Jay P. Liebrecht  
 Environmental Specialist  
 Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC-NWDO  
 Tom Kalman, DAPC, CO  
 Lisa Holscher, US EPA-Region V  
 DAPC-NWDO File  
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PS Form 3800, August 2006 See Reverse for Instructions

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