



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

RE: Wyandot County  
Bridgestone APM Co. – RTM Plant  
Premise # 0388010047  
**Inspection Letter**  
**Notice of Violation – HPF**  
**GC2, GC7**

July 17, 2008

**CERTIFIED MAIL**

**7006 0100 0004 1318 4146**

Mr. Dave Osmun  
Environmental Safety & Health Coordinator  
Bridgestone APM Co. – RTM Plant  
235 Commerce Way  
Upper Sandusky, Ohio 43351

Mr. Osmun:

This letter shall serve as a follow-up to the inspection conducted on June 26, 2008 of the Upper Sandusky – RTM facility by Jennifer Jolliff, Melanie Ray and this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility. Based on our discussions, our observations during the inspection and a review of the company's files, our findings are as follows:

1. In accordance with 40 CFR 63.3881, the company is required to demonstrate compliance with the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, Subpart M MMM. This subpart establishes the requirements necessary for the company to demonstrate initial and continuous compliance.

In a letter to the Ohio Environmental Protection Agency (OEPA) dated December 26, 2006, the company requested approval that the results of a recent compliance emission test be determined satisfactory for the emission rate with add-on control option specified in 40 CFR 63.3960(c). The OEPA approved this request which consequently established the operating restrictions for regenerative thermal oxidizer (RTO) #2 according to Subpart M MMM. This test was conducted on December 8, 2005.

At the Northwest District Office's (NWDO) request, a compliance emission test was performed for RTO #1 on August 23, 2007. The control system had been brought back on-line after remaining idle for a period of time. The results of this test also established the operating restrictions for this particular control device.

2. Under Subpart Mmmm, the company is required to operate both RTO units within the restrictions established by previous compliance emission tests. From these tests mentioned above, the resulting average combustion temperatures were as follows: RTO #1 – 1543°F and RTO #2 – 1632°F. These average combustion temperatures are to be recognized as the minimum operating limit for each RTO identified in 40 CFR 63.3967(a).

It is evident that the company is monitoring the control temperatures continuously and as frequently as required. However, it also appears that the company may possibly be operating outside of the limits established from their most recent compliance tests. Every instance that either RTO is operated below the established average combustion temperature, during a successive 3-hour period, is considered a violation of 40 CFR 63.4, 40 CFR 63.3892(b), 40 CFR 63.3963(c) and ORC rule 3704.05.

The NWDO requests that the company provide the date and time of every occurrence that the control equipment was operating below the established temperature. This information should include the time period from January 2, 2007 through the present date.

3. As of this date, the NWDO has not received any information regarding the initial notification required in Subpart Mmmm. The initial notification was required to be submitted no later than 1 year after January 2, 2004. This is a violation of 40 CFR 63.4, 40 CFR 63.9(b), 40 CFR 63.3910(b) and ORC rule 3704.05.

The NWDO requests that the company provide the initial notification information required by 40 CFR 63.3910.

4. As of this date, the NWDO has not received any information regarding the company demonstrating initial compliance with Subpart Mmmm. The notification of compliance was required to be submitted no later than 30 days following the end of the initial compliance period. Under this Subpart, the initial compliance period is defined in section 63.3960(b). This is a violation of 40 CFR 63.4, 40 CFR 63.9(h), 40 CFR 63.3910(c) and ORC rule 3704.05.

The NWDO requests that the company provide the information required for demonstrating initial compliance in accordance with 40 CFR 63.3910.

5. On the date of the inspection, the company could not provide any of the required records in Subpart MMMM. The records the company is responsible for keeping are found in 40 CFR 63.3930. These are violations of 40 CFR 63.4, 40 CFR 63.3930 and ORC rule 3704.05.

The NWDO requests that the company provide the information required for recordkeeping in accordance with 40 CFR 63.3930 to determine compliance.

6. The company is required to develop a work practice plan in accordance with 40 CFR 63.3893. No such plan was available during the inspection. The NWDO requests that the company submit a copy of this plan to determine compliance.
7. The facility is required to develop a written startup, shutdown, and malfunction plan in accordance with 40 CFR 63.3900. No such plan was available during the inspection. The NWDO requests that the company submit a copy of this plan to determine compliance.
8. During the inspection, the NWDO observed numerous baghouse deviations which control emission units P001 (Carbon black delivery system), P002 (Banbury system), and P003 (Kneader system). There are three baghouse devices at the facility, with each emission unit being vented to an individual baghouse. After reviewing the three baghouse operational logs, deviations were observed. Each baghouse was either being operated outside of its operational restriction or the company was not complying with the recordkeeping requirement.

Deviations were reported for emission units P001 and P003 during the 1<sup>st</sup> quarter of 2008 and 4<sup>th</sup> quarter of 2007. However, emission unit P002 is never accounted for in these reports. Additionally, deviations of the baghouse operating parameters were observed during the inspection that were not identified in previous quarterly deviation reports. These are violations of the operational, monitor/recordkeeping and reporting requirements of Permit To Install (PTI) #03-17065 (issued 2/28/06) and ORC 3704.05.

The company representative indicated that several deviations were the outcome of baghouse filters being on back order. This resulted in the control units being operated outside the permit limits. Other possible reasons for recordkeeping deviations have been reported as insufficient employee training or the facility not operating consistently due to customer demand.

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The NWDO requests that the company provide the specific dates that each emissions unit was in operation and the baghouse was not operating within the permit limits. Additionally, the company is to provide the specific dates that the emission unit was in operation and no pressure drop was recorded. To determine compliance, the information should cover the time period from either June 1, 2006 or the initial start-up of the emission unit through March 31, 2008.

9. The NWDO requests that the company provide calculations to demonstrate that the new "Accord dry fill – line 6" is a de minimis unit and therefore, does not require permits. This unit employs glycol ether in its production process.
10. The NWDO requests that the company resubmit the Title V renewal application. The original renewal submission has not been processed yet and several units have been added to the facility profile since that date.

The NWDO requests that the compliance information be submitted by **August 20, 2008**. Please be advised that the submission of information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to Ohio Revised Code Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

At this time, I would like to thank you for escorting us around the facility. Should you have any questions or comments regarding this letter, please feel free to contact Jennifer Jolliff at (419) 373-4112, Melanie Ray at (419) 373-4111, or myself at (419) 373-3110.

Sincerely,



Brian Riedmaier  
Division of Air Pollution Control

/csi

pc: Don Waltermeyer, NWDO, DAPC  
Samir Araj, NWDO, DAPC  
Tom Kalman, CO, DAPC  
Lisa Holscher, US EPA  
Jennifer Jolliff, NWDO, DAPC  
Melanie Ray, NWDO, DAPC  
DAPC; NWDO File

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MR DAVE OSMUN  
ENVIRONMENTAL SAFETY &  
HEALTH COORDINATOR  
BRIDGESTONE APM CO RIM PLANT  
235 COMMERCE WAY  
UPPER SANDUSKY OH 43351

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