



State of Ohio Environmental Protection Agency

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January 18, 2008

Mr. Joseph Clark, Director, Environmental Safety & Health
Bridgestone APM Company
P. O. Box 1505
1800 Industrial Drive
Findlay, Ohio 45839

RE: Resolution to Notice of Violation issued to Bridgestone APM Company- FPD
(0388010051) on July 27, 2006

Dear Mr. Clark:

This letter shall serve to resolve the Notice of Violation (NOV) issued to the above referenced facility on July 27, 2006. The violations in the letter were based a review of the facility's files during an inspection that occurred on June 1, 2006, in addition to determinations made regarding a permit modification for two polyurethane foam seal lines, emissions units P005 and P006, that was received by Ohio EPA on May 23, 2005. Ohio EPA cited Bridgestone APM Company- FPD (Bridgestone- FPD) for failing to maintain various records in accordance with issued permits, reporting violations and possible best available technology (BAT) and PSD violations for P005 and P006.

On September 19, 2006, Bridgestone- FPD provided a response to the recordkeeping and reporting violations. The letter stated that discrepancies and recordkeeping errors were reviewed and corrected.

As for the possible BAT and PSD violations, the company sent a letter dated October 9, 2006 outlining the facility's permitting history and their position that BAT and PSD had not been triggered. The letter stated that it has never been the company's intention to become a PSD major facility and internal miscommunications from the onset of permitting was the reason behind the questionable PTI modification request. Since the permit modification was returned to the company on October 27, 2006, Bridgestone- FPD has not reapplied for an emissions increase for P005 or P006. In discussions with the company on December 19, 2007, it was stated that they have been able to show compliance with the existing emissions limits for P005 and P006 and believe that the current emission rates for these units are correct and no increases will be requested. In addition, Bridgestone- FPD has installed accuspray guns and a robotic spray application in order to reduce emissions from these emissions units. Based on our conversations and information provided by the company, Ohio EPA does not believe that BAT or PSD have been violated and issues brought forth in the letter have been resolved.

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At this time, the matters outlined in the July 27, 2006, letter are resolved and require no further action.

In the interest of addressing the last few issues discussed with the company, Ohio EPA is requesting the following information:

- a facility-wide potential to emit analysis for review; and
- an administrative modification to incorporate the carbon adsorbers used on P005 and P006 for the purposes of controlling TDI, including the necessary parametric monitoring. The SCREEN3 modeling provided by the company on January 14, 2007 demonstrated compliance with the maximum achievable ground level concentration based on a controlled emission rate.

Since the company is working with the carbon adsorber manufacturer to determine appropriate operating parameters, Ohio EPA requests that Bridgestone- FPD submit a timeframe for the potential to emit analysis and administrative modification submittal by February 1, 2008.

Should you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address or call (419) 373-4112.

Sincerely,



Jennifer L. Jolliff
Division of Air Pollution Control

/llr

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