



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED MAIL # 91 7108 2133 3932 4449 0991

July 12, 2011

Union County
Veyance Technologies, Inc.
OEPA ID: 0180010013
Air Compliance Inspection

Tom Williams
Environmental Coordinator
Veyance Technologies, Inc.
13601 Industrial Parkway
Marysville, OH 43040

**Re: Notice of Violation
2011 Compliance Inspection**

Dear Mr. Williams:

On June 29, 2011, Ohio EPA Central District Office (CDO) met with you for the purpose of conducting a Full Compliance Evaluation (FCE) of Veyance Technologies, Inc. (Veyance) in Marysville, Ohio. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations.

Compliance was assessed based upon an examination of each emissions unit at the facility, an examination of monitoring and record keeping files maintained at the facility and a review of compliance reports and fee emissions reports maintained at CDO. Below is a summary of the inspection findings, violations (if any), and action items that need to be addressed.

1. **Finding**

During the review of records maintained at the facility, CDO staff observed that records were not being maintained in accordance with the requirements of PTI P0106276. Veyance was not maintaining monthly records of rolling, 12-month summations of individual HAP emissions, total combined HAP emissions and rubber throughput for emission units P005 through P014, P019 and P020. Section C.1.d)(2) of PTI P0106276 states:

"The permittee shall collect and record the following records on a monthly basis to document compliance with emissions limitations for emission units P005 through P014, P019, and P020 for the purpose of determining HAP emissions:

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

- a. *the company identification for each uncured rubber and mold release employed;*
- b. *the number of pounds of uncured rubber and employed;*
- c. *the number of gallons of mold release employed;*
- d. *the number of pounds of rubber throughput (finished product);*
- e. *the calculated individual HAP emissions for the current month, in pounds or tons;*
- f. *the calculated total combined HAP emissions for the current month, in pounds or tons;*
- g. *the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months); and*
- h. *the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months).*
- i. *the rolling 12-month summation of rubber throughput in pounds per year (i.e., the total lbs. of rubber throughput from the current month added to the summation of the total rubber throughput from the previous 11 months)."*

Violation

Failure to maintain monthly records of rolling, 12-month summations of individual HAP emissions, total combined HAP emissions and rubber throughput is considered a violation of the terms and conditions of PTI P0106276. Violations of the terms and conditions of an issued PTI are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

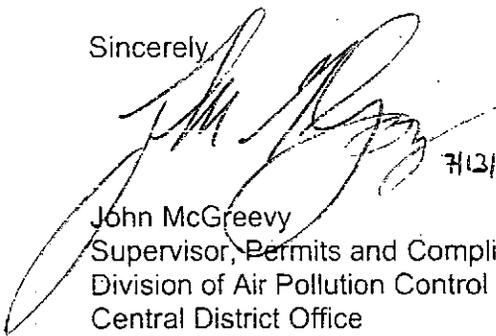
Requested Action

On July 8, 2011, CDO staff received an e-mail from Zak Kabelen (August Mack Environmental, Inc.) containing a spreadsheet with Veyance's monthly rolling, 12-month summations of individual HAP emissions, total combined HAP emissions and rubber throughput from February 2009 through June 2011. Veyance should continue to maintain this spreadsheet. No further action is requested at this time.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the ORC Section 3704.06. Submittal of the above requested information, including records and reports, does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC Section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Pam McCoy by phone at (614) 728-3810 or by e-mail at pam.mccoy@epa.ohio.gov.

Sincerely,



7/13/2011
John McGreevy
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: Adam Ward, Manager, DAPC/CDO
John Paulian, Supervisor, DAPC/CO

e: John McGreevy, Supervisor, DAPC/CO

