



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL # 91 7108 2133 3932 4450 1802**

October 20, 2008

Michael Caskey  
Fiber-Tech Industries, Inc.  
2000 Kenskill Avenue  
Washington Court House, OH 43160

**Re: Facility Inspection Conducted at Fiber-Tech on September 16, 2008  
Facility Premise # 0124010112 and Notice of Violation**

Dear Mr. Caskey:

Ohio EPA, Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates Fiber-Tech's courtesy and cooperation extended during the September 16, 2008 inspection of your facility located at 2000 Kenskill Avenue in Washington Court House, Ohio. The purpose of the inspection was to assure compliance with applicable permits along with state and federal rules and regulations.

Present during the inspection were Roger Mola and Michael Caskey of Fiber-Tech and Benjamin Halton of Ohio EPA, DAPC.

The inspection consisted of the following:

1. an examination of each emissions unit at the facility,
2. an examination of monitoring and record keeping files maintained at the facility, and
3. a review of reporting and fee emissions files maintained at CDO.

Below is a summary of the inspection findings and action items that need to be addressed.

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

**Finding 1:**

The renewal Title V Operating Permit was issued final on July 3, 2008 and contained terms and conditions for the following non-insignificant emissions units: P002, P003, P004, P009, R001, R003, R004, R005, R006, R007 and R008. No emissions units have been installed at the facility since issuance of the Title V permit.

P002 Saw #1 with cyclone and settling

This emissions unit was operating at the time of inspection within the parameters required by the Title V permit. All required records per the Title V permit are kept electronically and are up to date. All required reports have been submitted.

P003 Saw #2 with cyclone and settling

This emissions unit was operating at the time of inspection within the parameters required by the Title V permit. All required records per the Title V permit are kept electronically and are up to date. All required reports have been submitted.

P009 Trough drying cabinet

This emissions unit was operating at the time of inspection within the parameters required by the Title V permit. All required records per the Title V permit are kept electronically and are up to date. All required reports have been submitted.

R003, R004, R005, R006, R007 and R008 Lamination tables 1-6

These emission units were operating at the time of inspection within the parameters required by the Title V permit. All required records per the Title V permit are kept electronically and are up to date. All required reports have been submitted.

**Finding 2:**

P004 Rodgers Saw with cyclone and settling

This emission unit was not operating at the time of inspection. All required records per the Title V permit are kept electronically and are up to date.

A review of CDO files established that Fiber-Tech did not fulfill the requirements of the original, Title V Permit issued October 31, 2001 and the renewal Title V permit issued July 3, 2008. Specifically, Fiber-Tech has not provided the following information as required by the "Reporting Requirements" section for emissions unit P004:

1. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

**Finding 3:**

**R001 Gelcoat operations with enclosures and catalytic incinerator**

This emissions unit was operating at the time of inspection within the parameters required by the Title V permit. The catalytic incinerator associated with this unit was also operating within the parameters required by the Title V permit.

A review of on-site records established that records were not maintained in accordance with the record keeping requirements of Fiber-Tech's original Title V Permit issued October 31, 2001, the renewal Title V Permit issued July 3, 2008 and PTI 01-07475 issued January 3, 2008. Specifically, Fiber-Tech has not maintained the following daily and monthly records identified in the "Monitoring and/or Record Keeping Requirements" section for emissions unit R001:

1. The total number of pounds of cleanup materials (acetone and/or dibasic ester) employed, in pounds per day.
2. The organic compound emission rate for all cleanup materials (acetone and/or dibasic ester), in pounds per day.
3. The total number of hours the emissions unit was in operation.
4. The average hourly organic compound emission rate for all cleanup materials.
5. The number of gallons of cleanup materials employed each day.

6. The rolling, 12-month summation of all gelcoats employed, in pounds.
7. The total uncontrolled organic compound emission rate for all gelcoats, in pounds or tons per month.
8. The total uncontrolled (fugitive) organic compound emission rate for all gelcoats employed, in pounds or tons per month.
9. The calculated, controlled organic compound emission rate for all gelcoats employed, in pounds or tons per month.
10. The total organic compound emission rate for all gelcoats employed, in pounds or tons per month.
11. The total organic compound emission rate for all cleanup materials employed, in pounds or tons per month.

These recordkeeping requirements are necessary for the facility to demonstrate compliance with the applicable operational restrictions and OC limitations for emissions unit R001. Consequently, the facility also failed to report twenty-seven consecutive rolling, 12-month periods when the gelcoat usage limitation was exceeded.

**Violation:**

With respect to Findings 2 and 3 above, failure to maintain the required records and fulfill associated reporting requirements constitute violations of the Title V permit and Ohio Revised Code (ORC) 3704.05(C). Please note, ORC 3704.05(C) 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:**

CDO requests that Fiber-Tech perform the following actions for the resolution of the above violations:

1. Include the particulate emissions from EU P004 in all subsequent FERs or submit a separate annual report that includes the particulate emissions according to the provisions included in the Title V permit issued July 3, 2008. Because the Title V permit does not require specific recordkeeping for the particulate emissions from this EU, the facility may incorporate the EU in the FER and provide an explanation of how the emissions were calculated or provide the same information in a separate annual emissions report.
2. Immediately begin maintaining all monitoring and recordkeeping requirements for EU R001 as required by the Title V permit issued July 3, 2008. Using whatever data is available, the facility should create the required missing records for the past two years in order to evaluate the facility operations for compliance. Within 30 days of receipt of this letter, the facility should submit updated deviation reports for the previous two years for this emissions unit for each record indicating non-compliance. The reports may be submitted as an addendum to the original reports submitted for this emissions unit and do not need to include data that was previously submitted.
3. Beginning with the 2008 fourth quarter quarterly report, Fiber-Tech should begin submitting detailed emissions reports with respect to EU R001. The reports should include the following information at a minimum:
  - a. An identification of each of the operational restrictions associated with this EU (as listed in the Title V permit) accompanied by the measured/calculated actual operating parameter for the quarter.
  - b. An identification of each of the short and long term emissions limitations associated with this EU (as listed in the Title V permit) accompanied by the measured/calculated actual emissions determined according to the "Monitoring and or Record Keeping Requirements" section of the Title V permit.

Operational restrictions and emission limitations that relate to the WWWW MACT requirements can be omitted from these detailed emissions reports provided that they are included in the required semi-annual MACT compliance reports.

Michael Caskey  
Fiber-Tech Industries, Inc.  
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The requirements of these detailed emissions reports do not necessarily satisfy the requirements for reporting deviations according to the Standard Terms and Conditions of the Title V permit and should not be submitted in lieu of the information required for reporting deviations.

Beginning with the 2008 fourth quarter quarterly report, Title V facilities will be required to submit quarterly reports electronically via the Air Services portion of the eBusiness Center. Therefore, Fiber-Tech shall provide the detailed emissions reports required above as an attachment(s) to the electronic quarterly report.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the requested compliance plans, schedules, 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 Ben Halton of my staff at (614)-728-3809.

Sincerely,



Kelly Toth  
Air Permit and Compliance Supervisor  
Division of Air Pollution Control  
Central District Office

Enclosures: Ohio EPA - CDO Facility Evaluation Form & Emissions Unit Evaluation Forms

c: Ben Halton, DAPC/CDO  
Adam Ward, DAPC/CDO  
John Paulian, DAPC/CO