



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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**CERTIFIED MAIL # 7006 2760 0005 5171 5745**

June 11, 2007

Mr. Michael Caskey  
Fiber-Tech Industries, Inc.  
2351 Kenskill Avenue  
Washington Court House, OH 43160

**Re: Notice of Violation of ORC 3704.5(c) for violating the terms and conditions of a Title V permit**

Dear Mr. Caskey:

The Central District Office (CDO), Division of Air Pollution Control (DAPC), has recently begun the permitting process in order to issue a renewal Title V permit for Fiber-Tech Industries (Fiber-Tech) facility located in Washington Court House, Ohio. Upon review of the Terms and Conditions of the current Title V permit (issued October 31, 2001), several suspected deviations were identified and brought to your facility's attention for clarification. After further investigation, it has been determined that the facility has deviated from the terms and conditions of the Title V permit and can not fully demonstrate compliance with the permit. Below is a summary of the findings and any action items that Fiber-Tech needs to address.

### **Summary of Findings and Violations**

Findings:

Part III Section A.V.3.ii of the Title V permit issued to Fiber-Tech requires that the facility conduct an emissions test at the inlet of the emissions control device serving emissions units P001, P002 and P003 (Saw#1, Saw#2 and Rodger's Saw). The emissions testing was required to determine the emissions units uncontrolled mass rate of emissions (UMRE) and was to be conducted within six (6) months prior to Title V permit expiration on October 31, 2006. Fiber-Tech failed to conduct the emission testing, and therefore did not comply with the Title V permit requirement.

Part III Section A.III of the Title V permit issued to Fiber-Tech requires that the facility keep records sufficient to demonstrate compliance with the pound per hour and pound per day organic compound (OC) emission limitations for the six (6) lamination tables (R003-R008). Several monitoring and/or record keeping requirements listed within this section of the

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

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permit, if adhered to, would allow the facility to demonstrate compliance. Specifically, Fiber-Tech did not record the individual operating hours of the tables and the associated ovens. Fiber-Tech failed to maintain records in order to demonstrate compliance with the pound per hour and pound per day emissions limitations and therefore did not comply with the Title V permit requirement.

Part III Section A.V.2.c of the Title V permit issued to Fiber-Tech requires that the facility conduct an emissions test on any one of the lamination tables identified as R003-R008 in order to demonstrate compliance with the 3 lb/hr OC emission limitation. Fiber-Tech failed to conduct the emission testing and therefore failed to comply with the Title V permit requirement.

Violations:

Fiber-Tech violated the Ohio Revised Code (ORC) 3704.05(c) by violating the terms and conditions of a permit-to-install (PTI) and/or Title V operating permit. Be advised, ORC rule 3704.05(c) states:

*"No person who is a 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."*

### **Actions for Remedy**

CDO is requesting that Fiber-Tech submit the following within thirty (30) days of receipt of this letter.

1. Fiber-Tech will submit an ITT to conduct emission testing that will satisfy the terms and conditions of the Title V permit as they relate to emissions units P001, P002 and P003.
2. Fiber-Tech will submit an ITT to conduct emission testing that will satisfy the terms and conditions of the Title V permit as they relate to emissions units R003-R008.
3. Fiber-Tech will submit a plan outlining how the facility intends to demonstrate compliance with the monitoring and record keeping terms and conditions of the Title V permit as they relate to emissions units R003-R008.

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4. Fiber-Tech will resubmit the 2006 Title V Compliance Certification. Corrections should be made that indicate intermittent compliance with the terms and conditions of the permit as they relate to the findings identified above.

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 any compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions concerning the issues addressed in this letter, you may contact Ben Halton at (614) 728-3809.

Sincerely,



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

c: Isaac Robinson, DAPC/CDO  
John Paulian, DAPC/CO  
Roger Mola, Fiber-Tech Industries, Inc.