



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

August 2, 2007

**RE: Perry County
Superior Fibers
0664000067 P001
COMPLIANCE TEST
Certified: 70063450000190547205**

Mr. Donald Hock
Superior Fibers, Shawnee
9702 Ironpoint Road
Shawnee, Ohio 43782

Dear Mr. Hock:

On May 2nd and 3rd, 2007, Air Compliance Testing performed particulate and organic compounds emission compliance tests at Superior Fibers, 9702 Ironpoint Road, Shawnee on the curing oven (Emissions Unit P001). Ohio EPA received the test report on June 4, 2007. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1-5 and 25. The results of the test showed the source to be in compliance with the applicable allowable mass emission rates.

Our test review shows the following:

	Particulate		Organic compounds
	Scrubber on	Scrubber off	
A. Tested Emission Rate-lbs/hr:	0.56	0.67	2.57
B. Allowable Emission Rate-lbs/hr:	1.50	1.50	3.0
C. Source Operating Rate-lbs/hr:	4,900	4,813	4,900
D. Average Isokinetic Rate:	Run #1 - 97%; Run #2 - 95%; Run #3 - 95%		

This stack test report presented two areas of concern. The production rate during the stack test far exceeded the maximum production rate stated in Superior Fibers' Title V application. No explanation for this discrepancy has been provided. Additionally, the production rate data given to Ohio EPA staff on the day of the test differs significantly from production rate data presented in the stack test report. On July 24, 2007, Joe Laughery met with you to acquire additional production data in an effort to address these discrepancies. Production rate data provided to Ohio EPA the day of the test (see production rate data provided below) does not appear to correspond with anything Mr. Laughery reviewed in your production database. Please provide a written response to Mr. Joe Laughery addressing the above noted discrepancies within 30 days of the receipt of this letter.

Production rate data provided May 2nd and 3rd, 2007.

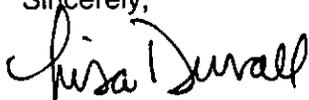
Run #1	3600 lbs/hr	
Run #2	3344 lbs in 98 minutes	2047.4 lbs/hr
Run #3	3484 lbs in 80 minutes	2613 lbs/hr
Run #4	3278 lbs in 78 minutes	2521.5 lbs/hr
Run #5	3514 lbs in 71 minutes	2969.6 lbs/hr
Run #6	3380 lbs in 85 minutes	2385.9 lbs/hr

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All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to Mr. Joe Laughery, Ohio EPA Southeast District Office, at 740-380-5234.

Thank you for your cooperation in this matter.

Sincerely,



Lisa Duvall
Environmental Specialist
Division of Air Pollution Control

LD/mlm

cc: Joe Laughery (Emissions Unit File Copy)
Dean Ponchak, DAPC-SEDO w/ CETA summary attachment
Test Report File Copy

DIVISION OF AIR POLLUTION CONTROL-SEDO

CETA APPENDIX K DATA

Stack Test Review Summary Form

FACILITY INFORMATION

FACILITY NAME: Superior Fibers

COUNTY: Perry

FACILITY ID: 0664000067 P001

SCC: 3 05 012 15

EMISSION TEST INFORMATION

POLLUTANT(S) TESTED: particulate and organic compounds

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: April 23, 2007

SCHEDULED TEST DATE FROM ITT: May 2 and 3, 2007

TESTING FIRM: Air Compliance Testing, Inc.

DATE TEST CONDUCTED: May 2 and 3, 2007

DAPC-SEDO TEST OVERSIGHT

NAME OF DAPC-SEDO STAFF WITNESS: Lisa Duvall and Joe Laughery

WERE ALL RUNS WITNESSED? YES

*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE? YES

WERE AUDIT SAMPLES TAKEN? NO

EMISSION UNIT INFORMATION

EMISSION UNIT ID#: P001

EMISSION UNIT DESCRIPTION: Curing oven

EMISSION UNIT MONITORING AND CONTROL

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: scrubber

TEST REPORT

TEST REPORT REVIEWER: Lisa Duvall

DATE TEST REPORT RECEIVED AT SEDO: June 4, 2007

POLLUTANT: particulate-scrubber on TEST METHOD: 1-5
ALLOWABLE EMISSION RATE (UNITS): 1.5 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): .56 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 4,000 lbs/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 3,476 lbs/hr
TEST PASSED YES NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 19, 2007

POLLUTANT: organic compounds TEST METHOD: 25
ALLOWABLE EMISSION RATE (UNITS): 3.0 lbs/hr 15 lbs/day
AVERAGE TEST EMISSION RATE (UNITS): 2.57 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 4,000 lbs/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 3,476 lbs/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 19, 2007

POLLUTANT: particulate-scrubber off TEST METHOD: 1-5
ALLOWABLE EMISSION RATE (UNITS): 1.5 lbs/hr 15 lbs/day
AVERAGE TEST EMISSION RATE (UNITS): 0.67 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: 4,000 lbs/hr
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 4,813 lbs/hr
TEST PASSED YES NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: July 19, 2007

I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:

- AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**
 AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY

July 13, 2007

Date of Review

Lisa Duvall

Reviewed by