



**Environmental
Protection Agency**

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

September 21, 2012

**RE: Perry County
Superior Fibers Shawnee LLC
Facility ID #0664000067
Inspection NOV
Non-HPV**

Certified: 70102780000197044824

Mr. Don Hock
Superior Fibers Shawnee LLC
P.O. Box 89
Bremen, OH 43107

Dear Mr. Hock:

On August 20, 2012, Ohio EPA, Division of Air Pollution Control (DAPC), Southeast District Office (SEDO), inspected the Superior Fibers Shawnee LLC (Superior Fibers) facility located at 9702 Ironpoint Road in Shawnee, Ohio. The purpose of the inspection was to determine the company's status of compliance with state and federal air pollution regulations and the air permits issued for this facility. Ohio EPA was represented by Sarah Harter, Jessica Kelley, Racheal Davies and me, and you represented Superior Fibers during the inspection. I have enclosed a copy of the completed inspection forms for your reference.

There are currently three non-insignificant emissions units permitted at your facility:

- P001- Process cure oven
- P002- Glass fiber mat forming unit (Including forming units 01-32)
- P007- Glass fiber mat forming unit (Including forming units 33-64)

Superior Fibers' Title V permit was issued May 29, 2002, and expired on May 29, 2007. Your Title V renewal application was received on November 13, 2006, and is currently under review at this office.

At the time of the inspection, emissions units P002 and P007 were in operation, and emissions unit P001 was not operating. No new compliance issues were noted during the inspection. However, Superior Fibers continues to operate in a state of non-compliance because P002 and P007 have been modified without first obtaining a permit-to-install.

Based on observations during the facility tour, file review, and a review of the reports, the following violation was discovered. Copies of the checklists completed as part of the inspection are enclosed.

(1) Failure to obtain a permit-to-install (PTI) prior to modifying emissions units P002 and P007
Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(a)

OAC rule 3745-31-02(A)(1)(a) specifies that "(A) Permit-to-install or PTIO (1) Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the: (a) Installation or modification of any new source that is, or will be, part of a facility, as defined in Chapter 3745-77 of the Administrative Code, and that is required to obtain a Title V permit under Chapter 3745-77 of the Administrative Code, without first obtaining a permit-to-install from the director."

Superior Fibers failed to obtain PTIs for emissions units P002 and P007. Substantial increases in the production capacity of P002 and P007 since the initial installation of these units in 1972 and 1980, respectively, indicate that these units have been modified, as defined in 3745-31-01(AAA), and are, therefore, subject to the requirements of OAC rule 3745-31-02(A)(1).

This has been an outstanding issue that has been documented in the following correspondence: March 29, 2004, inspection letter; September 29, 2006, inspection letter; December 28, 2007, Final Findings and Orders; June 30, 2008, inspection letter; and March 31, 2010, inspection letter. The outcome of the May 5, 2011, meeting between Superior Fibers, Ohio EPA-DAPC, and the Attorney General's Office regarding the Title V permit appeal and other issues was that Superior Fibers would submit PTI applications for the 42 forming drums. To date, we have not received these permit applications.

Within 7 days of your receipt of this letter, please submit to this office a timeframe which specifies when Superior Fibers plans to submit the PTI applications for the 42 forming drums.

Comments:

- **Organic Compound (OC) records for P002 and P007:** During a review of the records, it was noted that Superior Fibers uses an OC usage factor of 60 pounds per shift per unit. We discussed this number with Russell Browning (Quality Control) who indicated that this number is an estimation of how much resin is mixed to fill the tank back up and how much is used to maintain the correct viscosity.

Even though Superior Fibers is keeping records, you are not measuring how much resin you are actually employing. Please develop a more precise method to demonstrate compliance with the requirements contained in the current Title V permit. Also, we had requested a copy of the OC record spreadsheet be emailed to us so that we could check and verify the information that is used in reporting. That OC report was received via email on September 11, 2012, and is currently under review.

- **Facility profile cleanup:** During the inspection, it was noted that several emissions units listed in the facility profile are no longer on the premises or are permanently shut down. Please review the emission units and update the facility profile to reflect any permanently shut down units, dates of shut down, etc.

Also, a Binder Mixing Tank (V1) was not listed on the facility profile. Please add this to the facility profile.

There are currently 22 forming drums listed under P002 and 20 forming drums listed under P007. These emission units need to be added to the facility profile which you will need to do prior to submitting the PTI applications.

- **Updated Title V PTO application:** Either after or at the same time you submit the PTI applications for the 42 forming drums, you will need to submit an updated Title V PTO application. Please ensure that the greenhouse gas emissions calculations are included with this revised application.

Your cooperation and assistance were greatly appreciated during the visit. If you have any questions or need additional information, feel free to contact me at (740) 380-5259 or via email at miki.mercer@epa.state.oh.us.

Sincerely,



Myka L. Mercer
Environmental Specialist 2
Division of Air Pollution Control
Southeast District Office

MLM/cs

Enclosures

cc: Dean Ponchak, DAPC/SEDO
Bruce D. Weinberg, DAPC/CO
Mickey Jencius, U.S. EPA, Region V