



AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency * Division of Summit County Public Health * Serving Medina, Portage and Summit Counties

Telephone: (330) 375-2480 * Fax: (330) 375-2402
araqmd@araqmd.org

Sam Rubens, MPA, R.S.
Administrator

8/6/2013

Certified Mail

Michael J. Neumann
Network Polymers
1353 Exeter Road
Akron, OH 44306

Re: Notice of Violation Operating without Permits.

Dear Mr. Neumann:

This is in follow-up to our meeting on 06/27/13 and the supplemental information provided by Network Polymers and your consultant through 08/05/13 and is intended to summarize my findings regarding the general compliance status of your facility with applicable air pollution control requirements for your facility located at 1353 Exeter Road, Akron Ohio. I would like to thank you for Network Polymer's self disclosure of this information and cooperation demonstrated to this point.

Please be advised that several pieces of equipment appear to be lacking Ohio EPA Division of Air Pollution Permits to Install and Operate PTIO; these are issues that require your immediate attention.

Ohio Administrative Code (OAC) 3745-31-03(A)(1)(b), requires a PTIO from the Director of Ohio EPA be issued prior to installation and operation of any new air contaminant sources, unless they meet one of the permanent exemptions specified in OAC rule 3745-31-03, or other exemptions allowed for in the OAC.

The equipment at your facility that may need air permits is:

- 6 polymer production lines
- Burn-off oven
- Fugitive particulate emission sources

The appropriate application forms are available in electronic format at: <http://www.epa.state.oh.us/dapc/permits/permits.html>

Additionally based on the potential emission calculations it appears Network Polymers has triggered one or more of the major source emission limits in Title V of the Clean Air Act. These emission triggers required Network Polymers to apply for a Title V operating permit or obtain for a Federally Enforceable State Operating Permit (FESOP) from the Director of the Ohio EPA.

Continued operation of these emissions units without a valid permit being issued by the Director, is a violation of OAC rule 3745-31-03 and Ohio Revised Code (ORC) Chapter 3704.

To resolve these violations submit a complete application for each emission unit and a written synthetic minor operating strategy to Ohio EPA as soon as possible, but no later than 30 days from receipt of this notice. The application may be submitted using the eBusiness Center: Air Services (<https://ebiz.epa.ohio.gov>). For assistance with Air Services you may contact Linda Lazich at linda.lazich@epa.state.oh.us or (614) 644-3626. In addition, training videos and guidance are available by clicking "Answer Place" on the main banner at www.epa.ohio.gov.

Mr. Michael J. Neumann
Network Polymers
August 6, 2013
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This letter or information pursuant to this letter does not constitute a waiver of the Ohio Environmental Protection Agency's (EPA) authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case

Again thank you for your cooperation. If you have any questions concerning this Notice of Violation, please contact me at 330-812-3873 or email: dlaclair@schd.org

Sincerely,



Duane LaClair
Engineering Supervisor

xc: Bruce Weinberg, DAPC
John Paulian, DAPC
Bryan Zima, Legal Office
Brian Dickens, Region 5 U.S. EPA
Sam Rubens - Akron Regional Air Quality Management District