



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

Re: Richland County
0370010118
Newman Technology, Inc.
Stack Test/Return to Compliance (RTC)

August 21, 2013

Mr. Jonathon Shade
Newman Technology, Inc.
100 Cairns Road
Mansfield, Ohio 44903

Dear Mr. Shade:

The stack test conducted on April 16, 2013, on Ohio EPA emissions unit No. K001 (Miscellaneous Metal Parts Paint Line with Regenerative Thermal Oxidizer), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

Critical Test Data - VOC

	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate^a
Runs 1-3 (average)	0.12 lb/hr as propane 99.1% control efficiency	1.68 lbs/hr 95% control efficiency	14.1 lbs VOC/hr	60.2 lbs VOC/hr
Run 4 (low load testing)	0.15 lb/hr as propane 98.4% control efficiency	1.68 lbs/hr 95% control efficiency	13.4 lbs VOC/hr	60.2 lbs VOC/hr

Also, an average regenerative thermal oxidizer temperature of 1600°F was recorded for the test.

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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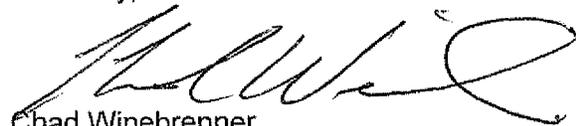
The compliance demonstration is acceptable and satisfies the compliance demonstration requirements contained in the Permit to Install. Please note that the source was operating at 23.4% of its maximum process weight rate for the high load testing. The Ohio EPA will conditionally accept these test results if the company agrees to notify our office within 14 days of exceeding the process weight rate achieved in this test by 10% or more. In addition, the company must agree to conduct a retest of this source within 45 days of exceeding the 10% threshold. Please send a written response within 14 days of this letter stating whether or not the company agrees to the conditional acceptance of these test results.

Also please note that the above source operating rates are only estimates that were calculated from the number of parts sprayed and the amount of paint each part was expected to receive. For future testing the company should provide actual weight measurements of the paint applied. The paint barrel should be weighed before and after each test run and the difference taken. For this test the company provided paint/barrel weights for the beginning of test run 1 and for the ends of test runs 1 and 4. No information was provided for runs 2 and 3.

This letter shall also serve as a follow-up to the Notice of Violation (NOV) letter dated February 25, 2013. Newman Technology, Inc has satisfied the information request listed in the NOV and the violation for failing to test K001 within 12 months of permit issuance for P0087523, issued July 15, 2010 has been resolved.

Thank you for your cooperation in this matter. Please feel free to contact this writer at (419) 373-3121 if you have questions or comments.

Sincerely,



Chad Winebrenner
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC, NWDO
DAPC, NWDO file
DAPC, NWDO Stack File

ec: Chad Winebrenner, DAPC, NWDO
Jay Liebrecht, DAPC, NWDO
Tom Sattler, DAPC, NWDO
Robert Teer, DAPC, NWDO
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Mark Budge, DAPC, NWDO
Brian Dickens, U.S. EPA, Region V