



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

October 18, 2007

RE: RESPONSE TO SEPTEMBER 25, 2007,
LETTER FROM REFCOTEC, INC. (02 85 01 0376)

CERTIFIED MAIL

Mr. Tim Sheehan, Vice President
REFCOTECH, Inc.
542 Collins Blvd.
Orrville, Ohio 44557

Dear Mr. Sheehan:

The purpose of this correspondence is to reply to your September 25, 2007, letter to Ohio EPA, Division of Air Pollution Control (DAPC). Your letter was in response to my June 14, 2007, Notice of Violation (NOV) to REFCOTECH for failure to comply with Title V permitting and fee requirements, in accordance with Ohio Administrative Code (OAC) 3745-77 and OAC 3745-78.

Based upon information submitted in your September 25, 2007, letter and additional information provided by your consultant, as well as the discussion held on July 23, 2007, between our office and your consultant, Ohio EPA Central Office has determined it will accept your proposed testing method and subsequent results to calculate the organic compound (OC) emissions generated from the operation of the mixers in your facility.

Based on our review of your testing results, Ohio EPA agrees with your assertion that REFCOTECH is not a major source, nor is it subject to Title V permitting or fee requirements. Therefore, your facility is not in violation of OAC rule 3745-77 and OAC rule 3745-78.

Ohio EPA expects to receive your revised Permit-to-Install (PTI) applications soon, which you had originally submitted earlier this year for your existing operations, as well as the proposed new additional mixer.

Please be advised that installation and/or operation of any air contaminant source without a PTI and/or Permit-to-Operate (PTO) is a violation of OAC 3745-31 and/or OAC 3745-35.

Should you have any questions regarding this matter, please feel free to contact me at (330) 963-1174.

Sincerely,

C. (Tracy) Gu
Environmental Specialist
Division of Air Pollution Control

TG:bo

cc: Tom Kalman, DAPC, CO
Dennis Bush, DAPC, NEDO
Bob Princic, DAPC, NEDO
Ed Fasko, DAPC, NEDO
Lisa Hoischer, U. S. EPA Region V

