



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 17, 2010

Mr. Doug Dean
Plant Manager
Third Dimension, Inc.
P.O. Box 309
Geneva, OH 44041

RE: Fee Emissions Reports for 2008 and 2009 calendar years for Division of Air Pollution Control Program for the site located at 633 Pleasant Ave. in Geneva, Ohio - DAPC Facility ID No. (02-04-03-0449)

Dear Mr. Dean:

As discussed during our 6/17/10 telephone conversation, a revised fee report for calendar year 2009 is requested to be submitted via Air Services by **7/15/10**. Likewise, a revised fee report for calendar year 2008 is requested to be submitted by **7/24/10**.

Fee Emissions Report for 2008

The fee emission reports, uploaded on 8/27/09 and 10/14/09, are incomplete because emissions from the molding operations (P003 – P005) do not accurately reflect actual operations in violation of Ohio Administrative Code Rule (OAC) rule 3745-78-02. As was done in reports for previous years, we understand that you wish to estimate emissions from two different product types.

Fee Emissions Report for 2009

The revised format does include separate calculations for each of two product types (EPE and EPS) molded at the mold operations (P003 – P005). However, your electronic records of the rolling 12-month emissions of organic compounds (OCs), Emissions Monthly OC 2009.xls file, received on 6/17/10, indicate that the rolling 12-month emissions for the period ending on 12/09 is estimated to be 21.3 tons OC/yr. The fee emissions report file uploaded on 4/16/10 have a sum total of 2.01 tons OC/yr rather than 21.3 tons OC/yr.

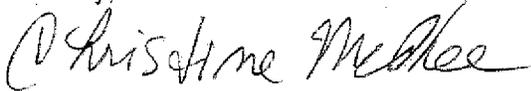
The causes of the under reported emissions may be in the either in the materials throughput unit values, in tons, and/or the "Uncontrolled Emissions Factor (lbs/materials units)" values developed by Third Dimension. In order to ensure that correct values are input into the report, we suggest that complete numerical calculations be provided as supporting data for the Uncontrolled Emissions Factor (lbs OC/ton materials)" values. It is highly recommended that the uncontrolled emissions factor calculations be sent to the undersigned at Northeast District Office for review prior to submittal of a revised electronic report.

MR. DOUG DEAN
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We will consult with our Central Office if a corrected 2009 fee report format may be used to send a revised fee report for the 2008 calendar year emissions.

Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

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