



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 Korieski, Director

October 24, 2007

RE: INSPECTION FOLLOW-UP LETTER  
WARNING LETTER  
HIGH PRIORITY FACILITY  
DAPC FACILITY ID # 02-78-00-0013

CERTIFIED MAIL

Mr. Steve Newell  
Vice President of Operations  
Denman Tire Corp.  
400 Diel South Rd.  
Leavittsburg, OH 44430

Dear Mr. Newell:

The purpose of this letter is to provide you with a follow-up regarding the facility inspection of Denman Tire on September 27, 2007. The purpose of the inspection was to ensure that all emissions units within your facility are in compliance with all applicable air pollution regulations. The efforts that you, Jeff Leeworthy, and David Konrad of HzW Environmental, made in providing a plant tour and furnishing all requested information materials were greatly appreciated.

Based on the inspection, calculations, and review of your records, with the exception of #11 Banbury (EU No. P008), it appears that Denman Tire is operating in compliance with its current Title V permit. Visible emissions (VE) readings using Method 9 of 40 CFR, Part 60, were performed to evaluate the opacity levels of the coal-fired boiler (EU ID No. B001). Based on the VE readings, B001 showed compliance with its respective opacity limitation. Emissions from other emissions, however, were not evaluated since those units were not operating at the time of the inspection.

One area of concern that needs to be addressed is Denman Tire's failure to furnish, at the time of the facility inspection, the required visible emissions weekly check records for visible particulate emissions from the stack serving #11 Banbury, for all periods of time preceding September 2007. It was brought to my attention that the VE inspection records pertaining to emissions unit P008 were misplaced and couldn't be found. Denman Tire only provided the VE check records for the month of September 2007.

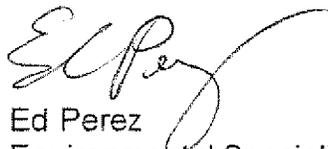
As specified in Part III - Terms and Conditions for Emissions Units, Section A.III.1. of P008 of your Title V Permit, Denman Tire is required to perform and record weekly checks for any visible particulate emissions from the stack serving #11 Banbury. Failure to comply with any of the specified terms and conditions of your Title V permit is construed as a violation.

MR. STEVE NEWELL  
OCTOBER 24, 2007  
PAGE 2

The Division of Air Pollution Control (DAPC) is requiring Denman Tire to make all necessary steps in preventing this "missing" of records from occurring in the future. Denman Tire is required to provide an acceptable plan to this office within (30) days of receipt of this notice, as to how demonstration of compliance will be accomplished.

If you have any questions, please feel free to call me at (330) 963-1273.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Perez', written in a cursive style.

Ed Perez  
Environmental Specialist  
Division of Air Pollution Control

EP:bo

cc: Ed Fasko, Ohio EPA, NEDO, DAPC