



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

February 27, 2009

RE: NOTICE OF VIOLATION
HIGH PRIORITY FACILITY

CERTIFIED MAIL

Mr. Steve Newell
Vice President of Operations
Denman Tire Corporation
400 Diehl South Road
Leavittsburg, OH 44430

Dear Mr. Newell:

I have reviewed your fourth quarter deviation report dated January 29, 2009, received through Ohio EPA eBusiness. The report lists an exceedence of the cumulative permit limit for individual HAPs due to HCl emissions from the Coal Boiler (B001).

It was also mentioned that the exceedence resulted from poor coal quality, with the chlorine level increasing through the year. The report also stated Denman is actively working to identify a new coal source to bring chlorine levels back to a manageable level.

Your Title V permit limits individual HAP emissions of 9.99 tons per rolling, 12-month summation. It also requires monitoring and recordkeeping on a monthly basis of the HCl emissions rate for B001 based upon the chlorine coal analysis from the permittee or coal supplier.

As a result of this violation, until further notice, Denman shall submit a monthly report containing the HCl emissions from B001 for the previous month, an updated rolling, 12-month summation of HCl emissions, copies of the analysis of the coal used containing the chlorine content in parts per million, and the calculations of the monthly HCl emissions. The report should be submitted through the Ohio EPA eBusiness, Air services site.

Continued violations may result in a referral of this situation to our enforcement section for further action and potential fines as allowed under the Ohio Revised Code 3704.99(A).

If you have any questions, please feel free to contact me at(330) 963-1243.

Sincerely,

Robert Goulish
Environmental Engineer
Division of Air Pollution Control

RG:bo

pc: Tim Boyer, Denman Tire
Tim Fischer, OEPA, NEDO, DAPC
Tom Kaiman, OEPA, CO, NEDO
Lisa Holscher, USEPA, Region V