



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 14, 2008

Mr. Freeman Byler
AFCO Benton, Ltd.
6075 C.R. 207
Millersburg, OH 44654

CERTIFIED MAIL

RE: Preliminary Complete Determination for PTI 02-22966, Seven Coating Operations, and Notice of Violation for Installing without Proper Permits; DAPC Facility ID 02-38-00-0231

Dear Mr. Byler:

This letter is to inform you that on March 10, 2008, this office received your application for a permit-to-install (PTI) for your seven wood coating operations, and that I have been assigned to process your application. After our initial review, your application has been found to be preliminarily complete; therefore, we can begin the technical review phase. **This preliminary completeness determination does not imply that the application is approvable, only that we have enough information to continue the review.**

Please be advised that installing two coating operations in 1996 and five additional coating operations in 2003 without first applying for and receiving a PTI, is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Because installation started prior to applying for the PTI, the fee for this permit will be doubled, as required by Ohio Revised Code 3745-11(J).

Operating the new emissions units without applying for a permit-to-operate is in violation of OAC Rule 3745-35-02. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

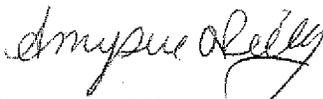
Permit applications are generally reviewed on a first come, first serve basis. During the technical review, you may be contacted for additional information or for clarification. Once the review is complete, a PTI recommendation will be prepared either approving or denying the application. If the review indicates a denial, you will be contacted to discuss options. The recommendation will then be forwarded to Ohio EPA, Division of Air Pollution Control (DAPC), Central Office. It is possible they may ask for clarifying information before proceeding to issue either a draft permit, a direct final permit, or a denial of the application.

MR. FREEMAN BYLER
MARCH 14, 2008
PAGE 2

I estimate that review of your application will be completed and a recommendation forwarded to the Central Office, DAPC, in approximately four weeks, provided the application is found to be technically complete and no additional information is needed.

Please be assured that we will do everything possible to process your application in a timely manner. If you have any questions concerning this letter or your application, please contact me at (330) 963-1298.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

ec: Dennis Bush, Ohio EPA, NEDO, DAPC
Ed Fasko, Ohio EPA, NEDO, DAPC
Rob Jarrett, Jarrett Environmental Management

cc: Bob Princic, Ohio EPA, NEDO, DAPC
Tom Kalman, Ohio EPA, CO, DAPC
Lisa Holscher, US EPA, Region V, Air and Radiation