



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

Re: Hardin County
Durez Corporation
13717 State Route 68 S
Kenton, OH 43326
Premise #0333010004
Notice of Violation (NOV/non-HPV)

June 14, 2012

Mr. William H. Bazell, Manufacturing Manager
Durez Corporation
13717 State Route 68 South
Kenton, Ohio 43326

Dear Mr. Bazell:

This letter shall serve as follow-up to the air emissions inventory (AEI) submittal that was received on April 2, 2012 as well as the letter dated April 25, 2012 requesting an extension to the submittal of Permit to Install and Operate (PTIO) applications. The air emissions summary has been submitted on behalf of Durez Corporation (herein referred to as "Durez") that included all air contaminant sources that are operating at the facility. That summary identified three potential emission sources that require a PTIO and the submittal would occur by April 27, 2012. The follow-up letter requested an extension to May 25, 2012 for the submittal. The application has been received but has been placed on hold until answers can be provided to the questions posed in this letter.

Based on the information that has been reviewed and compared to the existing information by the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO), the following are the findings:

1. A review of the information contained in the Permit to Operate (PTO) applications dated May 21, 1996 clearly demonstrate that Durez was operating as a Title V facility based on the requested emissions but permitted as a non-Title V facility. The emissions of phenol which is a Hazardous Air Pollutants (HAP) would have been in excess of the Title V threshold of ten (10) tons per year.

2. There were a number of emissions units that had significant maximum annual emission rates but all were shut down on August 13, 2009. The following table details a few of those units:

Emission Unit ID	Company ID	Emissions (tons/year)
P008	G-401, G-402	15 (phenol)
P012	MX-401, R-416	30 (phenol)
P013	MX-402, R-415	30 (phenol)
P017	PO-503, PO-505 & PO-506	18 (phenol)
Z001	MX-302, MX-304, MX-305	2.1 (phenol)
Z002	MX-307, MX-308, MX-309	2.1 (phenol)
P003	MX-201, MX-205-207, T205	4 tons (unknown)

3. The air emissions inventory submitted by Durez identifies three emissions units that require permitting either as a renewal permit or initial installation permit: sandvik breaker and packout (emissions unit P038, company ID CR-4014, CV-4014, PO-4014), resin crusher and mixers with dust collector (emissions unit P046, company equipment ID CR-5101) and equalization basins (company equipment ID T-6401, T-6402 and T-6403). A PTIO application was received on May 25, 2012 for P038 and P046 and this permit (P0110161) is currently on hold pending submittal of additional information that contains an explanation of the process flow diagrams and a basis for the emission calculations.
4. NWDO's review of the facility's file demonstrate that Durez is in violation of not having applied for PTI and subsequent PTIO applications pursuant to OAC rule 3745-31-02 or PTO applications pursuant to OAC rule 3745-35-02 as well as Ohio Revised Code (ORC) 3704.05 for the following emissions units:

Emission Unit ID	Company Equipment ID
P022	K-4002, C-4002, T-4013, F-4001
P029	K-4003, F-4008, T-4008, T-4031, T-4032, C-4005
P034	PO-5101, PO-5102, PO-5103, MX-5104, MX-5105 & DC-5104
P036	GR-5101, DC-5103
Not established*	CV-4020, PO-4020, PO-4021, PO-4022, DC-4014
P038*	CR-4014, CV-4014, PO-4050, PO-4051, PO-4014, F-4013, DC-4014
Not established	K-4001, C-4001, T-4007, F-4001
Not established*	CR-5101, MX-5102, MX-5103, DC-5101
Z005*	DC-5102
Not established	SI-4502

Emission Unit ID	Company Equipment ID
Not established	SI-5107
Not established	SI-5108
T008	T-2007
T017	T-2043
T018	T-2051
T019	T-2052
T020	T-2053
T022	T-2055
T023	T-2056
Not established	T-6401, T-6402, T-6403
Not established	Pump Seals, Flanges, Valves and Sampling Connections
Not established	K-4020, C-4003, T-4040, F-4004 **

* Installed after January 1, 1974

** Operated on May 29, 2012 in violation of not having permits issued prior to installation and operation of emissions unit.

5. On page 13 of the AEI document, it states that all of the boilers at Durez are currently on the Permit by Rule (PBR) register. Ohio EPA's records do not reflect this statement and show that emissions unit B003 does not have a PBR but B006 does. In the Facility Profile (FP), it notes that B006 was never installed. If this is not the case, please reflect that in a response. In addition, there appears to be a discrepancy as to what the exact firing rate in million British thermal units (MMBtu) is for B003. Currently, in the FP, it lists the rate at 9.7 MMBtu/hr whereas the AEI document lists the rate as 11 MMBtu/hr. This matter will need to be rectified. If the correct firing rate is over 10 MMBtu/hr, then a PBR application will need to be submitted for that boiler (B003).
6. Sufficient documentation needs to be provided regarding all emission units that includes a process flow diagram and basis for emission calculations. Please note that if Durez wishes any of the provided information to be considered confidential or trade secret, to follow the guidelines established in OAC rule 3745-3-07.

The information required above is to be submitted by July 17, 2012. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Mr. William H. Bazell, Manufacturing Manager
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If you have any questions or concerns regarding this letter, please feel free to contact me at (419) 373-3118 or by e-mail at mohammad.smidi@epa.state.oh.us.

Sincerely,



Mohammad Smidi, Environmental Specialist
Division of Air Pollution Control

/llr

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