



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 13 2015

REPLY TO THE ATTENTION OF:

James P. Bowman  
Vice-President and Chief Operating Officer  
Rack Processing Company, Inc.  
2350 Arbor Boulevard  
Dayton, OH 45439

Dear Mr. Bowman:

The U. S. Environmental Protection Agency has reviewed your 40 CFR Part 63, Subpart B applicability determination request dated June 19, 2015. Rack Processing Company, Inc. (Rack) is seeking a permit to install from Ohio EPA for a burn-off oven that will be used to remove plastisol from racks used in the plating industry.

According to your letter, Rack removes old plastisol through a pyrolysis process, heating the racks to approximately 435 degrees Fahrenheit. The plastisol heats up, expands and turns into a hard sponge-like material that is then manually removed from the rack.

As indicated in a July 28, 2015 letter to Rack from Sara Breneman, Chief, Air Enforcement Branch, EPA has determined that the new burn off oven would not be subject to the Standards of Performance for Commercial and Industrial Solid Waste Incineration Units, 40 C.F.R. Part 60, Subpart CCCC (CISWI). While there are currently no applicable standards under CISWI, the Clean Air Act (CAA) does require EPA to regulate units that combust solid waste under §129 of the CAA, rather than §112. Therefore, EPA agrees with your conclusion that installation of the new burn-off oven is not subject to the case-by-case determination requirements of either §112(g) or §112(j) of the CAA.

If you have any questions regarding this determination, please contact Rachel Rineheart, of my staff, at (312) 886-7017.

Sincerely,

  
Genevieve Damico  
Chief  
Air Permits Section