

AKRON REGIONAL  
AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency • Division of Summit County Public Health  
Serving Medina, Summit, and Stark Counties • 1 Summit Street

TELEPHONE: (330) 375-2480  
FAX: (330) 375-2402

Sam Rubens, MPA, R.S.  
Administrator

6/7/2013

Certified Mail

Mark M. Hudac  
FBC Chemical Corp.  
P.O. Box 599  
Mars, PA 16046

**Re: RESOLUTION OF VIOLATION – 2012 Full Compliance Evaluation**  
**Facility ID: 1652050190; Facility Address: 900 W. Smith Rd., Medina, OH 44256**

Dear Mark Hudac:

This letter is in response to the Notice of Violation (NOV) issued to the above-referenced facility on 8/29/2012. In the NOV, the Akron Regional Air Quality Management District (ARAQMD) requested that the permittee submit information required per federally enforceable state operating permit (FESOP) #P0101755. The following paragraphs summarize the violations cited, and the resolution of each.

Violation #1:

Monthly records of chemical throughput and volatile organic compound (VOC) emissions were not maintained for emissions units J001 (Truck Loading Rack), J002 (Drum Loading Rack), and T001 (Tank T-18). Monthly records were also not maintained for total VOC emissions from all chemicals used at the facility, and the rolling, 12-month summation of the facility-wide VOC emissions.

Resolution #1:

Monthly records dating from 2009 through 2013 were received by ARAQMD on 6/6/2013. Compliance was demonstrated with the permitted facility-wide and unit-specific emission limitations.

Violation #2:

The amounts of chemicals used (as identified on annual fee emission reports and calculations provided during the inspection) exceeded the annual chemical throughput restrictions for emissions units J001, J002, and T001.

Resolution #2:

The facility transitioned from Synthetic Minor to Non-Title V permitting status on 3/29/2013 with the issuance of permit-to-install and operate (PTIO) #P0111690, thereby eliminating the previous federally enforceable emission limitations, annual chemical throughput operational restrictions, record keeping and reporting requirements.

Violation #3:

Quarterly deviation reports did not identify actual exceedances of the annual chemical throughput operational restrictions for emissions units J001, J002, and T001.

Resolution #3:

Exceedances of annual chemical throughput operational restrictions were identified in quarterly deviation reports submitted for 3<sup>rd</sup> quarter 2012 through 1<sup>st</sup> quarter 2013.

With the above actions taken to bring this facility into compliance, the referenced violations are considered resolved. This letter or information pursuant to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions concerning this letter, please contact me at 330-812-3954 or email: [kkanoza@schd.org](mailto:kkanoza@schd.org).

Sincerely,



Kelly Kanoza  
Air Pollution Control Engineer, ARAQMD

Cc: Sam Rubens, Administrator, ARAQMD