



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

Re: Erie County
0322000043
Akzo Nobel Coatings, Inc.
Stack Test
Notice of Violation (NOV/non-HPV)

July 17, 2013

CERTIFIED MAIL

Mr. Dennis Allen
Akzo Nobel Industrial Coatings
300 Sprowl Road
Huron, Ohio 44839-2636

Dear Mr. Allen:

The stack test conducted on March 14, 2013, on Ohio EPA emissions unit No. P021 (Polymer Processing System K-6) and its associated thermal oxidizer, has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Critical Test Data
(In Three Run Averages)**

VOC

- | | |
|------------------------------------|----------------------------------|
| 1. Actual Emission Rate: | 1.09 lb/hr as propane, 95.3% DRE |
| 2. Allowable Emission Rate: | 0.53 lb/hr, 95% DRE |

(Process information has been omitted due to confidentiality issues).

An average RTO temperature of 1315°F was recorded for the test.

The emissions unit was being operated in violation of its allowable emissions rate for VOC. Failure to meet the allowable VOC emissions rate is a violation of Permit to Install 03-10744 issued June 27, 2002, term and condition II.A.1, OAC rule 3745-31-05(A)(3), and Ohio Revised Code 3704.05. It will therefore be necessary to retest this unit or take other appropriate action to achieve compliance with the applicable emission limitation.

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than **August 19, 2013**.

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Please note that the submission of the requested information to respond 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.

Please feel free to contact me at (419) 373-3069 or Miranda.Garlock@epa.ohio.gov if you have any questions.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC-NWDO
DAPC, NWDO Stack File
Follow-up File
Certified Mail Receipt Number 70091410000118346571

ec: Mark Budge, DAPC-NWDO
Jay Liebrecht, DAPC-NWDO
Jennifer Jolliff, DAPC- NWDO
Robert Teer, DAPC- NWDO
Tom Sattler, DAPC- NWDO
Miranda Garlock, DAPC- NWDO
Andrea Moore, DAPC- NWDO
Elissa Hartfield, DAPC- NWDO
Bruce Weinberg, DAPC- CO
Brian Dickens, US EPA, Region V
Dennis Allen, Akzo Nobel Industrial Coatings
Chuck Ruggles, Akzo Nobel Industrial Coatings
Dave Kuhn, Akzo Nobel Industrial Coatings