



# AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

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

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

Sam Rubens, MPA, R.S.  
Administrator

July 31, 2013

CERTIFIED MAIL

Mr. Richard Jones  
Firestone Polymers, LLC  
P.O. Box 26611  
Akron, OH 44319

Re: RESOLUTION OF VIOLATION  
Facility ID: 1677010000  
Firestone Polymers, LLC  
Location: 381 W. Wilbeth Road  
Akron, OH 44301  
Summit County

Dear Mr. Richard Jones:

This letter is in response to the Notice of Violation (NOV) issued to the above referenced facility on March 26, 2013. In the NOV, a compliance plan and schedule for achieving compliance was requested from the facility. The subsequent response to the NOV was received on April 24, 2013 and the appropriate steps were taken to bring the source(s) into compliance. The following information summarizes the violations cited, and the resolution of each.

1. Violation:

Firestone Polymers, LLC ("Firestone") failed to maintain the supplier's analysis of the percentage, by weight, of the OC, other than n-hexane, that are classified as HAPs in each shipment of Mixed Hexane Solvent for January 16, 2009 and October 5, 2009 shipments as required by Special Terms and Conditions C.3.I for emissions units P005 and P016 and C.4.I for emissions unit P017 of Permit to Operate (PTO) P0102562.

Resolution:

Firestone stated that all future analysis will continue to contain this information.

2. Violation:

Firestone failed to continuously record the presence of the pilot flame on June 5, 2011 as required by Ohio Administrative Code (OAC) rule 3745-21-09(B)(4)(d).

Resolution:

Firestone was able to recover the missing data from the DCS.

3. Violation:

Firestone was not maintaining a log of the operating times for the capture (collection) system, the flare, the monitoring equipment and the associated source(s) as required by OAC rule 3745-21-09(B)(4)(b)(i).

Resolution:

From the review of the revised 2<sup>nd</sup> quarter deviation report submitted on July 30, 2013, these records are now being maintained starting in January 2013.

4. Violation:

Firestone was not including the summary of the operating times for the capture system, the flare, the monitoring equipment and the associated sources in the quarterly deviation reports as required by OAC rule 3745-21-09(B)(4)(c).

Resolution:

From the review of the revised 2<sup>nd</sup> quarter deviation report submitted on July 30, 2013, this summary is now being included in the quarterly deviation reports.

5. Finding:

During the review of the records maintained at the facility, it was determined that when both burners of the flare are not operating there is no record of what was occurring with emissions units P005, P016 and P017 (i.e., not operating).

Resolution:

Firestone stated in their April 23, 2013 letter that they will note unusual conditions on any flare stack printout and in the flare stack operation log.

6. Violation:

Firestone failed to continuously record temperature for the thermal oxidizer for emissions unit P017 on July 8, 2008 as required by OAC rule 3745-21-09(B)(4)(d) and Special Term and Condition C.1 of PTO P0102562.

Resolution:

Firestone is investigating tying the recording chart into the DCS as a backup. Firestone stated that there is an interlock system between the drum dryer and the thermal oxidizer. The drum dryer can only operate if the thermal oxidizer is operating properly.

7. Violation:

Firestone was not maintaining a log the operating time of the capture system and the monitoring equipment for emissions unit P017 as required by OAC rule 3745-21-09(B)(4)(b)(i) and Special Term and Condition C.1.b of PTO P0102562.

Resolution:

Firestone has updated the record keeping. The record keeping now includes the operating time of the capture system and the monitoring equipment for emissions unit P017. These records were provided in the revised 2<sup>nd</sup> quarter deviation report submitted on July 30, 2013.

8. Violation:

Firestone was not including the summary of the operating times for the capture system and the monitoring equipment for emissions unit P017 and the thermal oxidizer in the quarterly deviation reports as required by Special Term and Condition D.2 of PTO P0102562.

Resolution:

From the review of the revised 2<sup>nd</sup> quarter deviation report submitted on July 30, 2013, this summary is now being included in the quarterly reports.

9. Violation:

Firestone failed to submit the summary of the operating times for the capture system, the thermal oxidizer, monitoring equipment and emissions unit P017 on a quarterly basis as required by OAC rule 3745-21-09(B)(4)(c).

Resolution:

From the review of the revised 2<sup>nd</sup> quarter deviation report submitted on July 30, 2013, this summary is now being included in the quarterly reports.

With the corrective actions taken to bring the source(s) into compliance, as indicated above, the referenced violations are considered resolved. Please note, however, that this does not preclude Ohio EPA's authority from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions, please contact me at (330)812-3953 or e-mail [lmiracle@schd.org](mailto:lmiracle@schd.org).

Sincerely,



Laura Miracle  
Akron Regional Air Quality Management District

cc: Bruce Weinberg, Central Office, Ohio EPA  
William MacDowell, Region 5 U.S. EPA  
Sam Rubens, ARAQMD