

AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

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

TELEPHONE: (330) 375-2480

FAX: (330) 375-2402

March 30, 2012

CERTIFIED MAIL

Robert Mangus
ACCEL Group Inc
325 Quadral Drive
Wadsworth, OH 44281

Re: NOTICE OF VIOLATION -
Facility ID: 1652100086
Accel Group Inc
Location: 325 QUADRAL DRIVE,
WADSWORTH, OH 44281
Medina County

Dear Robert Mangus:

The 2011 Annual Permit Evaluation Report (PER) submitted February 15, 2012 for emissions units R001, R002, R003, and R004 has been reviewed by Akron Regional Air Quality Management District (ARAQMD). There were several emission violations that were disclosed in this report in addition to the violations discovered during the November 15, 2011 facility inspection that have not been resolved.

I must advise you that ACCEL Group, Inc. has been and is still operating emissions units R002 and R003 in violation of the Federally Enforceable Permit to Install and Operate (FEPTIO) P0107572 and Ohio Administrative Code (OAC) rule 3745-31-05(A)(3). ACCEL Group, Inc. has also been operating emissions unit R004 in violation of FEPTIO P0107572, the Permit to Operate (PTO) issued final on January 30, 2006, and Permit to Install (PTI) #16-01972.

The FEPTIO and OAC rule 3745-31-05(A)(3) requires the volatile organic compound (VOC) content of each adhesive, thinner, and cleanup material employed not to exceed 3.3 pounds per gallon, as applied for emissions units R002 and R003. From May 1, 2011 through December 31, 2011, emissions units R002 and R003 employed 1176 gallons of an adhesive with a VOC content of 3.49 pounds of VOC per gallon. This constitutes a violation of OAC rule 3745-31-05(A)(3) and Emissions Unit Term and Condition C.3.b)(1)a. of FEPTIO P0107572.

The FEPTIO, the PTI, the previous effective PTO, and OAC rule 3745-31-05(A)(3) requires the emissions of VOC from each emissions unit not to exceed 3.96 pounds per hour, the emissions of acetone from each emissions unit not to exceed 3.96 pounds per hour, and the emissions of toluene from each emissions unit not to exceed 0.72 pound per hour for emissions units R002 and R003. Emissions units R002 and R003 exceed one or more of the above-mentioned emission limitations on January 13, 2011, February 8, 2011, February 16, 2011, March 7, 2011, March 22, 2011, May 3, 2011, May 20, 2011, May 24, 2011, July 25, 2011, August 1, 2011, October 4, 2011, November 18, 2011, and December 2, 2011. This constitutes a violation of OAC rule 3745-31-05(A)(3), Emissions Unit Term and Condition C.3.b)(1)a. of FEPTIO P0107572, Special Terms and Conditions A.2.a, A.2.b, and A.2.d of PTI #16-01972, and Special Terms and Conditions A.2.a, A.2.b, and A.2.c of the PTOs issued final on January 30, 2006 for emissions units R002 and R003.

The emission limitation violations listed above that occurred prior to March 21, 2011 should have been reported in the first quarter deviation report for 2011. This constitutes a violation of Special Term and Condition D.1 of the PTO for emissions units R002 and R003 issued final on January 30, 2006. Please revise and resubmit the first quarter deviation report for 2011 to address these emission limitation violations within 30 days of receipt of this letter.

The FEPTIO, the PTI, and the previous effective PTO requires the permittee to not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in emissions unit R004. Based on the material safety data sheet, the permittee has been employing a photochemically reactive cleanup material in emissions unit R004. This constitutes a violation of Emissions Unit Term and Condition C.2.c)(2) of FEPTIO P0107572, Special Term and Condition B.1 of PTI #16-01974, and Special Term and Condition B.1 of the PTO issued final on January 30, 2006.

The FEPTIO and the previous effective PTO requires the permittee to maintain records of the documentation of whether or not each material employed is a photochemically reactive material for emissions units R001 through R004. During the facility inspection these records were not available. This constitutes a violation Emissions Unit Terms and Conditions C.1.d)(2)a., C.2.d)(2)a., and C.3.d)(2)a. of FEPTIO P0107572 and Special Term and Condition C.2.a of the PTO for each emissions unit issued final on January 30, 2006.

The FEPTIO requires the permittee to report all deviations of the operational restrictions in the annual Permit Evaluation Report (PER). The permittee did not report that a photochemically reactive material was employed in emissions units R004 in the February 15, 2012 annual PER covering January 1, 2011 to December 31, 2011. This constitutes a violation of Emissions Unit Term and Condition C.2.e)(2) of FEPTIO P0107572. Additionally, the previous effective PTO required the permittee to submit a notification to the Director in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month. This constitutes a violation of Special Term and Condition D.3 of the PTO issued final on January 30, 2006

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Additionally, I am requested more detailed emission calculations for the Final Assembly Area to prove that the emissions unit is exempt per OAC rule 3745-15-05. OAC rule 3745-15-05 exemption is based on potential to emit not actual emissions unless daily records are being kept. OAC rule 3745-15-05 states that owner or operator shall provide information that is adequate to demonstrate that the source qualifies for the exemption. Currently, the only information I was provided was based on actual usage of the wood glue. The cleanup material emissions were not included in this calculation. Please provide detailed calculations showing the potential to emit for the organic compounds for all materials employed in the Final Assemble Area within 30 days of receipt of this letter. Please include the material safety data sheets for all materials employed.

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Laura Miracle.

Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact me at (330)812-3953 or E-mail lmiracle@schd.org.

Sincerely,



Laura Miracle
Akron Regional Air Quality Management District

cc: Tom Kalman, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA