

**AKRON REGIONAL  
AIR QUALITY MANAGEMENT DISTRICT**  
*the Ohio Environmental Protection Agency • Division of the Summit County Health*

TELEPHONE: (330) 375-2480

FAX: (330) 375-2402

May 15, 2012

CERTIFIED MAIL

Mr. Alan Sampson  
OMNOVA Solutions Inc.  
165 S. CLEVELAND AVENUE  
MOGADORE, OH 44260

Re: NOTICE OF VIOLATION -  
Facility ID: 1667000007  
OMNOVA Solutions Inc.  
Location: 165 S. CLEVELAND AVENUE,  
MOGADORE, OH 44260  
Portage County

Dear Mr. Alan Sampson:

The 1<sup>st</sup> quarter 2012 excess emission report (EER) and 1<sup>st</sup> quarter 2012 deviation report submitted by OMNOVA Solutions Inc. for emissions unit P004, P013, P014, P101, P103, P105, P106, P110, and P115 have been reviewed by Akron Regional Air Quality Management District (ARAQMD). Based on the review of the 1<sup>st</sup> quarter 2012 reports and the reevaluation of the 2<sup>nd</sup> and 4<sup>th</sup> quarter 2011 deviation reports, I must advise you that OMNOVA Solutions Inc. is operating emissions unit P004, P013, P014, P101, P103, P105, P106, P110, and P115 in violation of Permit to Install and Operate (PTIO) P0101911 and Ohio Administrative Code (OAC) rule 3745-31-05(D).

PTIO P0101911 and OAC rule 3745-31-05(D) require the permittee to operate and maintain equipment to continuously monitor and record organic compound (OC) emissions from the thermal oxidizer. The continuous OC monitoring system, which includes the flow monitoring equipment, shall maintain a minimum of 95 percent data capture efficiency. The 1<sup>st</sup> quarter EER and the 1<sup>st</sup> quarter 2012 deviation report for emissions units listed above indicated that the continuous emissions monitoring system (CEMS) for OC captured only 71.2 percent of the emission data and did not operate from March 4 through March 31, 2012. This constitutes a violation of OAC rule 3745-31-05(D) and Section C – Emission Unit Terms and Conditions 1.d)(4) and 2.d)(4) of PTIO P0101911.

Mr. Alan Sampson  
OMNOVA Solutions Inc.  
May 15, 2012  
Page 2

PTIO P0101911 and OAC rule 3745-31-05(D) require that the average combustion chamber temperature within the thermal oxidizer, during any 3-hour period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be less than 1,451 degrees Fahrenheit. The 2<sup>nd</sup> quarter 2011 deviation report for the emissions units listed above indicated that there were four deviations of the minimum temperature requirement. The first deviation occurred on April 27, 2011 and lasted about three hours, the second deviation occurred on May 22-23, 2011 and lasted about 15.5 hours, the third deviation occurred on May 23, 2011 and lasted less than one hour, and the fourth deviation occurred on June 11, 2011 and lasted about three hours. The 4<sup>th</sup> quarter 2011 deviation report and the 1<sup>st</sup> quarter 2012 deviation report indicated that there was a total of 972 minutes (16.2 hours) and 1,347 minutes (22.45 hours), respectively, that the minimum temperature requirement was not met for the emissions units listed above. This constitutes a violation of OAC rule 3745-31-05(D) and Section C – Emission Unit Terms and Conditions 1.d)(1) and 2.d)(1) of PTIO P0101911.

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](mailto:lmiracle@schd.org).

Sincerely,



Laura Miracle  
Akron Regional Air Quality Management District

cc: Donald Vanterpool, Central Office, Ohio EPA  
Jim Kavalec, Central Office, Ohio EPA  
William MacDowell, Region 5 U.S. EPA