

AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

the Ohio Env

*Division of
and Summit Coun.*

TELEPHONE: (330) 375-2480

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June 22, 2012

CERTIFIED MAIL
High Priority Violator
Criterion 7

Mr. Patrick Grothaus
3M Medina
1030 Lake Road
Medina, OH 44256

Re: NOTICE OF VIOLATION -
Facility ID: 1652050059
3M Medina
Location: 1030 Lake Road,
Medina, OH 44256
Medina County

Dear Mr. Patrick Grothaus:

This is in follow-up to my facility inspection on June 18, 2012 and June 19, 2012 and is intended to summarize my findings regarding the general compliance status of your facility with applicable air pollution control requirements.

I must advise you that 3M Medina has been and may still be operating emissions units K001, K002, K003, K004 and K005 in violation of one or more of the following: the Title V permit issued final on June 18, 2008, Title V permit P0108901, Permit to Install (PTI) 16-02229, PTI 16-02375, PTI 16-02263, Ohio Administrative Code (OAC) rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and 40 CFR Part 63, Subpart JJJJ.

The Title V permits and OAC rule 3745-21-09 require the permittee to record the mass of volatile organic compounds (VOC) per volume of each coating (excluding water and exempt solvents), as applied for emissions units K002 and K003. Additionally, the Title V permits and OAC rule 3745-31-05(A)(3) require the permittee to record the mass of organic compounds (OC) per volume of each coating (excluding water and exempt solvents), as applied for emissions unit K004. From the facility inspection, these records are not being maintained. This constitutes a violation of OAC rule 3745-31-05(A)(3) for K004, OAC rule 3745-21-09(B)(3)(f) for K002 and K003, Part III – Term and Condition A.III.1.b for emissions units K002, K003 and K004 of the Title V permit issued final on June 12, 2008, Emissions Unit Term and Condition C.2.d)(1)b. for K002, C.3.d)(1)b. for K003, and C.4.d)(1)b. for K004 of Title V permit P0108901, Special Term and Condition A.III.1.b for emissions unit K004 of PTI 16-02229, and Special Term and Condition A.III.1.b for emissions unit K003 of PTI 16-02375. When determining the VOC or OC content, the as applied VOC content must be determined when other materials are added to the coating unless these materials are compliant with the regulation.

The Title V permits and the PTIs require you to maintain various data on the coatings and cleanup materials employed to determine compliance with the applicable emission limitations from various rules for emissions units K002, K003, K004, and K005. From the facility inspection, the main "Lookup Table" that is used to do all your calculations and to determine compliance with the applicable emission limitations is not accurate resulting in compliance not being able to be determined. There were three coatings that were covered by one material data safety sheet (MSDS) that you had as 0.0 pounds of VOC per pound of coating and 0.0 pound of VOC per gallon in the "Lookup Table" but the coating contains vinyl acetate which is a VOC and a hazardous air pollutant (HAP).

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Looking at one of your data sheets you use to evaluate a new coating, you had octyl alcohol ($C_8H_{18}O$) identified as not being a VOC. Additionally for a new coating, you calculated the pound of VOC per pound of coating minus water and exempt solvent when the limitation in the regulation is 0.067 pound of VOC per pound of coating. This constitutes a violation of the Title V permit issued final on June 12, 2008, Title V permit P0108901, Permit to Install 16-02229, PTI 16-02375 and PTI 16-02263.

Title V permit P0108901 and 40 CFR Part 63, Subpart JJJJ require four thermocouple readings within the chambers of the thermal oxidizer to be compared once per minute for ten minutes on a quarterly basis for emissions units K001 and K005. From the records, the readings were compared once every two to four minutes. This constitutes a violation of Emissions Unit Term and Condition C.1.d)(5) for K001 and C.1.d)(7) for K005 of Title V permit P0108901 and U.S. EPA approved alternative to the calibration verification specified in section 63.3350(e)(9)(i) of 40 CFR Part 63, Subpart JJJJ.

The Title V permits and 40 CFR Part 63, Subpart JJJJ require a semiannual compliance report to be postmarked or delivered by January 31 and July 31 of each year. The January 31, 2010 and 2012 semiannual compliance reports were submitted on February 17, 2010 and February 28, 2012, respectively. This constitutes a violation of section 63.3400(c)(1)(iv) of 40 CFR Part 63, Subpart JJJJ, Part III – Term and Condition A.IV.3 for emissions units K001 and K004, A.IV.2 for K002, A.IV.5 for K003 and A.IV.4 for K005 of the Title V permit issued final on June 12, 2008, and Emissions Unit Term and Condition C.1.e)(3) for K001, C.2.e)(2) for K002, C.3.e)(5) for K003, C.4.e)(3) for K004 and C.5.e)(4) for K005 of Title V permit P0108901.

The Title V permit requires quarterly deviation reports to be submitted (i.e. postmarked) by January 31, April 30, July 31, and October 31 of each year. The October 31, 2010 Title V quarterly deviation report was submitted on November 17, 2010. This constitutes a violation of Part I - General Term and Condition A.1.c.i of the Title V permit issued final on June 12, 2008.

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: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA