

AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT

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

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L. M. Malcolm, P.E.
Administrator

Mr. Stanley Choromanski
Bostik
8500 Hadden Road
Twinsburg, OH 44087

Re: P901 cement packaging equipment malfunction Twinsburg Ohio.

Dear Mr. Choromanski:

This letter is in response to a recent complaint investigation regarding excessive emissions from the Bostik facility located at 8500 Hadden Rd in Twinsburg Ohio (OEPA ID 1677130068) and is intended to summarize our findings and outline your obligations under Ohio air pollution regulations. It also serves as follow-up to a 01/10/08 facility inspection accompanied by Pete Howard, Plant Operations Manager for the Bostik facility. Thanks to Pete Howard for his assistance and professional manner during the inspection. The Akron Regional Air Quality management District (ARAQMD) is a contractual agent for Ohio EPA responsible for enforcing air pollution regulations in Summit, Portage and Medina counties.

Based on our files, the Bostik Company operates a Cement Packaging Plant emission unit P901 which consists of raw material silos and vents, bucket elevator, shaker and rotary screens, weigh hopper, mixers, cement packaging operation, and all related transfer points. Applicable air pollution control requirements for this emission unit include the installation and operation of enclosures and hoods to adequately enclose, contain, capture, and vent particulate emissions to a fabric filter. Performance of the control system must be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture. Particulate emissions from the fabric filter(s) must not exceed 3.0 pounds per hour and the building which houses this process equipment shall exhibit no visible emissions of fugitive dust to ambient air.

Observations of the facility on 01/08/08 noted significant visible particulate emissions from the building which houses the packaging plant and silos was in violation of the applicable permit requirements. During the investigation the building tower roof was observed to be caked with white particulate matter indicating a fugitive emissions and noncompliance with the permit visible emissions limitation. On 01/09/08 I received a malfunction report from Mr. Jeff Pyka from Bostik's Corporate Office in Wauwatosa, WI indicating the malfunction of the Silo overfill alarm resulted in emissions to ambient air.

In order to resolve this issue, Bostik must study the Cement Packaging Plant P901 to analyze the performance of the emission control system to comply with applicable requirements and eliminate visible particulate emissions to ambient air. This analysis should consist of a review of

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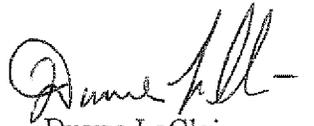


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the events resulting in the malfunction, a statement of actions taken to correct the problem, and actions to be implemented to prevent future occurrence. This study should also include a timetable indicating any significant milestones to be met.

The acceptance of a plan and schedule to resolve air pollution violations in this case in no way waives the right of Ohio EPA or U.S. EPA to pursue additional enforcement action in this matter. Note that State law allows for monetary penalties of up to \$25,000 per day per violation. The decision to pursue or decline to pursue additional enforcement action will be made at a later date.

Please respond to this letter within 15 days. If you have any questions, please contact me at 330-375-2480, ext 6052.


Duane LaClair
Air Quality Engineer

CC:

Mr Frank Markunas - ARAQMD

Mr. Tom Kalman - OEPA DAPC