



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

September 19, 2008

CERTIFIED MAIL

Mr. Lane Freshwater
3M Medina
1030 Lake Road
Medina, Ohio 44256

Dear Mr. Freshwater:

This is in follow-up to my facility inspection on August 27, 2008 and September 3, 2008 and is intended to summarize my findings regarding the general compliance status of your facility with applicable air pollution control requirements.

Please be advised that there are some deficiencies that require your immediate attention and corrective action. Keep in mind that these items could be construed as being violations of applicable requirements and should be addressed as such. The deficient items, related emissions unit(s), and brief description are identified below (see checked items):

X Monitoring and/or Record Keeping Requirements

OEPA Emissions Unit(s) ID: K001 and K005

Description: Initially, the records of the rolling, 3-hour average of the combustion temperature for the thermal incinerator and the rolling 3-hour average of the pressure reading for the coating lines' capture systems were not easily accessible. Please be aware that section 63.10(b)(1) of 40 CFR Part 63, Subpart A states "The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review." For future facility inspections, please make sure that at least two years of records are readily available for inspection and review.

OEPA Emissions Unit(s) ID: K001 and K005

Description: Section 63.3550(e)(9)(i) of 40 CFR Part 63, Subpart JJJJ states you must "Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly." It appears that you may not be calibrating the temperature monitoring equipment according to the manufacturer every 3 months. I am requesting that you submit the manufacturer's specification for calibrating the data logger, chart recorder, and the temperature indicator. I would also like to request that you submit the manufacturer's specification for calibrating the pressure indicators and data logger for the pressure indicators.

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X Monitoring and/or Record Keeping Requirements (cont'd)

OEPA Emissions Unit(s) ID: K001 and K005

Description: Section 63.8(c)(6) of 40 CFR Part 63, Subpart A states "The continuous parameter monitoring system (CPMS) must be calibrated prior to use for the purposes of complying with this section. The CPMS must be checked daily for indication that the system is responding. If the CPMS system includes an internal system check, results must be recorded and checked daily for proper operation. Please verify that the daily checks of CPMS are occurring.

OEPA Emissions Unit(s) ID: K002, K003, and K004

Description: For January through July 2006 and January through July 2007, you did not calculate the monthly average organic hazardous air pollutant (HAP) content of all coating materials as-applied as required by section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ. Also, it appears that you are tracking the volatile organic content for compliance with 40 CFR Part 63, Subpart JJJJ. If this is true, you need to include the volatile organic compound (VOC) content of the anti-foaming agent that is sometimes added to the water-base coatings. Please verify whether you are tracking the organic hazardous air pollutant (HAP) content or volatile organic content per sections 63.3360(c) and (d) of 40 CFR Part 63, Subpart JJJJ.

OEPA Emissions Unit(s) ID: K002, K003, and K004

Description: For the VOC input of 45 Mg (50 tons) of VOC or less per 12 month period requirement in 40 CFR Part 60, Subpart RR, you need to track the VOC from the anti-foaming agent that is added to the coating.

OEPA Emissions Unit(s) ID: K003 and K004

Description: For the VOC input of 45 Mg (50 tons) of VOC or less per 12 month period requirement in 40 CFR Part 60, Subpart RR, you need to track the VOC input as a rolling, 12-month summation not on an annual basis (January through December). For emissions unit K004, you should have this record starting in March 2006 when the administrative modification to Permit to Install (PTI) 16-02229 was issued final.

OEPA Emissions Unit(s) ID: K003 and K004

Description: It appears that you are not tracking the anti-foaming agent that is added to the coatings. You are required to determine the VOC/organic compound (OC) content of each coating as applied as required by either PTI 16-02229 or PTI 16-02375 and the Title V permit. Also, the OC emissions from the anti-foaming agent would need to be included in the total OC emissions from all coatings and cleanup materials employed.

OEPA Emissions Unit(s) ID: K004

Description: You are not tracking the OC emissions from all coatings and cleanup materials employed, in tons for each month. You are tracking the OC emissions separately (i.e., OC emissions for all coatings, in tons and OC emissions from all cleanup materials, in tons) for each month. I am requesting that you either modify your record keeping to track the OC emissions from all coatings and cleanup materials monthly or modify the terms and conditions in the record keeping requirements in PTI 16-02229 and the Title V permit to meet how you are currently keeping your records.

X Monitoring and/or Record Keeping Requirements (cont'd)

OEPA Emissions Unit(s) ID: K005

Description: You are recording pounds instead of gallons for each coating employed. You are also not tracking the VOC emissions from all coatings and cleanup materials employed, in pounds or tons for each month. You are tracking the VOC emissions separately (i.e., VOC emissions for all coatings, in pounds or tons and VOC emissions from all cleanup materials, in pounds or tons) for each month. I am requesting that you either modify your record keeping to track the VOC emissions from all coatings and cleanup materials monthly and the gallons of each coating employed or modify the terms and conditions of the record keeping requirements in PTI 16-02263 and the Title V permit to meet how you are currently keeping your records.

OEPA Emissions Unit(s) ID: L001

Description: You are assuming that the waste solvent shipped off-site is 100% solvent. If the solvent is waste solvent, there should be some solids in the solvent or there would be no reason to ship the solvent off-site. You need to adjust to only account for the solvent (excluding solids) being shipped off-site. Mark Clark stated that approximately 15% by weight of the solvent shipped off-site is solids thus the calculation should be (amount of waste solvent shipped off-site) x (1-0.15).

X Other

Description: For emissions units K001 and K005, there appears to be deviations of the rolling, 3-hour average combustion temperature on November 6, 2007, November 13, 2007, November 27, 2007, January 15, 2008, January 23, 2008, January 24, 2008, May 7, 2008, and May 20, 2008. These deviations should have been reported in the January 31, 2008, April 30, 2008, and July 31, 2008 quarterly deviation reports for the Title V permit and in the January 31, 2008 and July 31, 2008 semiannual compliance reports for 40 CFR Part 63, Subpart JJJJ, and the 2007 annual Title V compliance certification. If these deviations have occurred, please revise the above-mentioned reports. If these deviation have not occurred, please provide an explanation why these deviations have not occurred along with documentation. I would also request that the record keeping for the rolling, 3-hour average combustion temperature for each emissions unit be reviewed to verify that no other deviations have occurred.

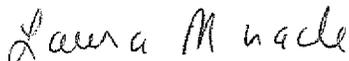
Please respond to any requests and comments no later than fourteen (14) days from the receipt of this letter. If you need additional time, please notify this Agency in writing.

This letter is a reminder of your regulatory responsibility regarding the operation of air pollution emissions units at your facility. A thorough review of related Ohio EPA Permits is recommended.

Keep in mind that this determination is based upon a site visit and preliminary review of available records. It does not ensure that you have been or will continue to operate in compliance and in no way limits any liability if violations are discovered for this time period.

If you have any questions or need assistance, please contact me at (330)375-2480 ext. 4239.

Sincerely,



Laura Miracle
Air Quality Engineer