

AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT

Agency of the Ohio Department of Public Safety • Division of Environmental Health • Akron Health Department
1000 Summit Street, Akron, OH 44308

TELEPHONE: (330) 375-2480
FAX: (330) 375-2402

L. M. Malcolm, P.E.
Administrator

September 24, 2012

CERTIFIED MAIL
High Priority Violator
Criterion 2 and 7

Mike Kubrin
Schneller LLC
6019 Powdermill Road
Kent, OH 44240-7109

Re: NOTICE OF VIOLATION -
Facility ID: 1667040015
Schneller LLC
Location: 6019 Powdermill Road,
Kent, OH 44240-7109
Portage County

Dear Mike Kubrin:

This is in follow-up to my facility inspection on August 29, 2012, August 30, 2012, and August 31, 2012 and is intended to summarize my findings regarding the general compliance status of your facility with applicable air pollution control requirements. I would like to thank you for your cooperation during my visit.

I must advise you that Schneller LLC has been and is still operating emissions units K001, K003, K004, K005, K006, and K007 in violation of one or more of the following: the Title V Permit issued final on November 21, 2005, Permit to Install (PTI) #16-01949, PTI #16-01601, PTI #16-01557, PTI #16-02376, PTI P0107304, PTI P0109415, Title V Permit P0106486, Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rule 3745-21-19, OAC rule 3745-21-09, 40 Code of Federal Regulations (CFR) Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating and 40 CFR Part 63, Subpart KK, NESHAP for Printing and Publishing Industry.

The NESHAPs, the PTIs and the Title V Permits require you to install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specification. 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. The main temperature data loggers for emissions units K001, K003, K004, K005 and K007 have never had the calibration verified and these data logger have not been replaced. This constitutes a violation of section 63.3350(e)(9)(i) of 40 CFR Part 63, Subpart JJJJ; section 63.828(a)(2)(ii) of 40 CFR Part 63, Subpart KK; Part III – Terms and Conditions A.III.8.i.i for emissions units K001 and K005, A.III.5.i.i for emissions unit K004 and A.III.9.i.i for emissions units K003 and K007 of the Title V Permit; Emissions

CITICENTER - SUITE 904

146 SOUTH HIGH STREET • AKRON, OHIO 44308

An equal opportunity employer and provider of services - CRA 1964

Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.4.d)(1) for emissions units K001, K003, K004, and K007 of Title V Permit P0106486; Emissions Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.3.d)(1) for emissions units K001, K003, K004 and K007 of PTI P0107304 and PTI P0109415 and Part III – Special Term and Condition A.III.9.i.i of PTI #16-02376 for emissions unit K007.

The NESHAP for Paper and Other Web Coating, the PTI for emissions unit K007 and the Title V Permit require you to develop a site-specific monitoring plan for the capture systems of emissions units K001, K003, K004, K005 and K007. You must make the monitoring plan available for inspection by the permitting authority upon request. During the inspection, you could not produce the site-specific monitoring plan for the capture systems for emissions units K001, K003, K004, K005 and K007. This constitutes a violation of section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ; Part III – Terms and Conditions A.III.9 for emissions units K001 and K005, A.III.6 for emissions unit K004 and A.III.10 for emissions units K003 and K007 of the Title V Permit and Part III – Special Term and Condition A.III.10 of PTI #16-02376 for emissions unit K007.

The NESHAP for Printing and Publishing Industry, the PTIs and the Title V Permit require you to ensure that the capture efficiency measured during the initial compliance test is maintained by submitting a plan that identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained; that discusses why this parameter is appropriate for demonstrating ongoing compliance and that identifies the specific monitoring procedures. Your Notification of Compliance Status letter date December 9, 2010 did not contain the above required information for emissions units K001, K003, K004, K005 and K007. This constitutes a violation of section 63.828(a)(5) of 40 CFR Part 63, Subpart KK; Emissions Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.3.d)(1) for emissions units K001, K003, K004 and K007 of PTI P0107304 and PTI P0109415 and Emissions Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.4.d)(1) for emissions units K001, K003, K004 and K007 of Title V Permit P0106486.

The PTIs and the Title V Permit require you to maintain monthly records of the total volatile organic compounds (VOC) emission rate from all coatings and cleanup materials employed for all controlled emissions units (K001, K003, K004, K005 and K007), in ton(s) per month. This record is not being maintained. This constitutes a violation of Facility-Wide Terms and Conditions B.4.a)(11) of Title V Permit P0106486, B.3.a)(11) of PTIs P0108225 and P0109415 and B.2.a)(11) of PTI P0107304.

OAC rule 3745-21-09, 40 CFR Part 64, the PTIs and the Title V Permit require you to collect and record for each day a log of the operating time for the capture (collection) system, the control device, the monitoring equipment, and the associated emissions unit. The log of operating times required above is not being kept daily for emissions units K001, K003, K004, K005 and K007. This constitutes a violation of Part III – Terms and Conditions A.III.3.b, A.III.14.a and A.III.15.a for emissions unit K001, A.III.4.a, A.III.15.a, and A.III.16.a for emissions units K003, A.III.3.b, A.III.11.a, and A.III.12.a for emissions unit K004, A.III.3.a, A.III.14.a, and A.III.15.a for emissions unit K005, and A.III.3.a, A.III.15.a, and A.III.16.a

for emissions unit K007 of the Title V permit; Part III – Special Term and Condition A.III.3.b of PTI #16-01949 for emissions unit K001; Part III – Special Term and Condition A.III.4.a of PTI #16-02186 for emissions unit K003; Part III – Special Term and Condition A.III.2.a of PTI #16-01601 for emissions units K004 and K005; Part III – Special Term and Condition A.III.3.a of PTI #16-02376 for emissions unit K007; Emissions Unit Terms and Conditions C.1d)(3)b. for emissions unit K005 and C.3.d)(3)b. for emissions units K001, K003, K004, and K005 of PTI P0107304; OAC rule 3745-21-09(B)(3)(l)(i) and 40 CFR Part 64.

OAC rule 3745-21-19, the PTI and the Title V Permit require you to maintain the following records: for each coating in use at the facility: the name and VOC content as received and as applied, the type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19, and where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19; all data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied; the amount (gallons) of each coating used each month at the facility; for any coating operation controlled by a VOC emission control system: identification of the coating line, documentation on the overall control efficiency of the VOC emission control system and the control efficiency of any thermal or catalytic oxidizer with the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19 and for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month. Except for the coating name and the VOC content as applied, the remaining above-mentioned records are not being maintained as applicable to emissions units K001, K003, K004, K005, K006 and K007. This constitutes a violation of OAC rule 3745-21-19(J)(2); Emissions Unit Terms and Conditions C.1.d)(10) for emissions unit K005, C.2.d)(3) for emissions unit K006, and C.3.d)(11) for emissions units K001, K003, K004, and K007 of PTI P0109415 and Emissions Unit Terms and Conditions C.1.d)(10) for emissions unit K005, C.2.d)(3) for emissions unit K006 and C.4.d)(11) for emissions units K001, K003, K004 and K007 of Title V Permit P0106486.

The Title V permit, the PTI, OAC rule 3745-31-05 and 40 CFR Part 64 requires the average combustion temperature within the thermal incinerator, for any three-hour block of time when emissions unit(s) K001, K003, K004, K005 and/or K007 is/are in operation, shall not be less than 1350 degrees Fahrenheit. The average combustion temperature was below the above-mentioned temperature limitation for two three-hour blocks of time for emissions unit K001, for four three-hour blocks of time for emissions unit K003, for five three-hour blocks of time for emissions unit K004 and for seven three-hour blocks of time for emissions unit K005. This constitutes a violation of Part III – Terms and Conditions A.II.1 of the Title V Permit for emissions units K001, K003, K004 and K005; Part III – Special Term and Condition A.II.1 of PTI #16-02186 for emissions unit K003; OAC rule 3745-31-05(D); OAC rule 3745-31-05(A)(3) and 40 CFR Part 64.

The NESHAPs, the PTIs and the Title V Permits require the average combustion temperature in any three-hour period must not fall below the combustion temperature limit established during the performance test. You must meet the operating limit at all times after you establish it. The minimum average combustion temperatures established are 1393 degrees Fahrenheit for emissions units K001 and K007 and 1391 degrees Fahrenheit for emissions units K003, K004 and K005 from the initial performance tests. The average combustion temperature was below 1393 degrees Fahrenheit for eight three-hour blocks of time for emissions unit K001. The average combustion temperature was below 1391 degrees Fahrenheit for 44 three-hour blocks of time for emissions unit K003, for 38 three-hour blocks of time for emissions unit K004 and for 45 three-hour blocks of time for emissions unit K005. These excursions of the average combustion temperatures constitute a violation of section 63.825(h)(3) of 40 CFR Part 63, Subpart KK, section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ; Part III – Terms and Conditions A.II.4 for emissions unit K001, A.II.3 for emissions unit K003 and A.II.2 for emissions units K004 and K005 of the Title V Permit; Emissions Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.3.d)(1) for emissions units K001, K003 and K004 of PTIs P0107304 and P0109415 and Emissions Unit Terms and Conditions C.1.d)(1) for emissions unit K005 and C.4.d)(1) for emissions units K001, K003 and K004 of Title V Permit P0106486.

OAC rule 3745-21-19, the PTI and the Title V Permit require the control device to be operated at a three-hour block average value greater than the average combustion temperature established during the most recent compliance test(s) that demonstrated compliance. The average combustion temperatures established are 1401 degrees Fahrenheit for emissions units K001 and K007 and 1421 degrees Fahrenheit for emissions units K003, K004 and K005 from the compliance tests. The average combustion temperature was below 1401 degrees Fahrenheit for 738 three-hour blocks of time for emissions unit K001 and for 260 three-hour blocks of time for emissions unit K007. The average combustion temperature was below 1421 degrees Fahrenheit for 1,155 three-hour blocks of time for emissions unit K003, for 1,638 three-hour blocks of time for emission unit K004, and for 1,417 three-hour blocks of time for emissions unit K005. This constitutes a violation of OAC rule 3745-21-19(G); Emissions Unit Terms and Conditions C.1.d)(4) for emissions unit K005, C.3.d)(4) for emissions units K003 and K004 and C.3.d)(5) for emissions units K001 and K007 of PTI P0109415 and Emissions Unit Terms and Conditions C.1.d)(4) for emissions unit K005, C.4.d)(4) for emissions units K003 and K004, and C.4.d)(5) for emissions units K001 and K007 of Title V Permit P0106486.

The Title V Permit and 40 CFR Part 64 require the differential pressure across the enclosure to be greater than 0.007 inch of water column for emissions unit K001, K003 and K005. Also, you established the differential pressure across the enclosure to be a minimum of 0.007 inch of water column for the NESHAP for Paper and Other Web Coating in your Notification of Compliance Status report. The differential pressure across the enclosure was not greater than 0.007 inch of water column for four three-hour periods of time for emission unit K001, for eleven three-hour periods of time for emissions unit K003 and for six three-hour periods of time for emissions unit K005. The differential pressure across the enclosure was below 0.007 inch of water column for four three-hour periods of time for emission unit K001, for three three-hour periods of time for emissions unit K003 and for one three-hour period of time

for emissions unit K005. This constitutes a violation of 40 CFR Part 64, Part III – Terms and Conditions A.II.4 and A.II.5 for emissions unit K001, A.II.3 and A.II.4 for emissions unit K003 and A.II.2 and A.II.3 for emissions unit K005 of the Title V Permit and section 63.3321(a) of 40 CFR Part 63, Subpart JJJJ.

The Title V Permit, the PTIs and OAC rule 3745-31-05(A)(3) require the VOC emissions from coatings and cleanup materials to not exceed 16.25 pounds per hour for emissions unit K003 and 19.34 pounds per hour for emissions unit K004. On July 19, 2011 and September 20, 2011, the above-mentioned VOC emission limitations were exceeded. This constitutes a violation of OAC rule 3745-31-05(A)(3); Part III – Special Term and Condition A.I.1 of PTI #16-02186 for emissions unit K003; Part III – Special Term and Condition A.I.1 of PTI #16-01601 for emissions unit K004 and Part III – Emissions Unit Term and Condition A.I.1 of the Title V Permit for emissions units K003 and K004.

The NESHAP for Paper and Other Web Coating and the Title V Permit require for each deviation from an emission limitation (emission limit or operating limit) the total operating time of each affected source during the reporting period must be contained in the compliance report. There were deviations reported in compliance report due July 31, 2011 for emissions units K001 and K007 and in the compliance report due January 31, 2012 for emissions units K003, K004 and K005. These compliance reports did not contain the total operating time of each affected source. This constitutes a violation of 63.3400(c)(2)(v)(A) of 40 CFR Part 63, Subpart JJJJ and Part III - Emissions Unit Term and Condition A.IV.11.b.v.(a) for emissions unit K001, A.IV.12.b.v.(a) for emissions unit K003, A.IV.7.b.v.(a) for emissions unit K004, A.IV.10.b.v.(a) for emissions unit K005 and A.IV.9.b.v.(a) for emissions unit K007 of the Title V Permit.

The Title V Permit, the PTI and OAC rule 3745-21-09 require quarterly summaries of the log of operating time for the capture (collection) system, the control device, the monitoring equipment, and the associated emissions unit. The quarterly summaries for emissions unit K001 did not contain information on the capture system and monitoring equipment. This constitutes a violation of OAC rule 3745-21-09(B)(3)(m), Part III – Emissions Unit Term and Condition A.IV.3.a of the Title V Permit and Part III – Special Term and Condition A.IV.3.a of PTI #16-01949.

The Title V Permit and the PTI require the total average hourly VOC emissions vented to the incinerator, in pounds per hour, from emissions units K003, K004, and K005 to be recorded each day for emissions unit K003. This record is not being recorded. This constitutes a violation of Part III – Emissions Unit Term and Condition A.III.2.k of the Title V Permit and Part III – Special Term and Condition A.III.2.k of PTI #16-02186.

The Title V Permit and the PTI require the total organic compound (OC) emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day to be recorded each day for emissions unit K006. This record was not being recorded. This constitutes a violation of Part III – Term and Condition A.III.1.d of the Title V Permit and Part III – Special Term and Condition A.III.1.d of PTI #16-01557.

Mike Kubrin
September 24, 2012
Page 6

The Title V Permits, the NESHAPs, OAC rule 3745-21-09, OAC rule 3745-21-19 and the PTI require the deviations of emission limitations, operational restrictions or control device operating parameter limitations be reported either quarterly or semiannually. The above-mentioned deviations have not been reported with the exception of two temperature deviations. This constitutes a violation of one or more of the following: the Title V Permit issued final on November 21, 2005, PTI #16-01949, PTI #16-01601, PTI #16-01557, PTI #16-02376, PTI P0107304, PTI P0109415, Title V Permit P0106486, OAC rule 3745-31-05(A)(3), OAC rule 3745-21-19, OAC rule 3745-21-09, 40 CFR Part 63, Subpart JJJJ, NESHAP for Paper and Other Web Coating and 40 CFR Part 63, Subpart KK, NESHAP for Printing and Publishing Industry.

In addition to the deviations described above, there were some issues with the format of the data presented during the inspection. The monitoring for the diversion of flow to atmosphere as required by OAC rule 3745-21-19(G) was not legible on the graphs. This record needs to be in a format that can be reviewed. Also, the graphs of the temperatures are not easy to tell if there were any deviations. The range for the temperature axis is too large. For future inspections, please have the three-hour rolling temperature data downloaded to an Excel spreadsheet for each hour of time.

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