



AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

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

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Sam Rubens, MPA, R.S.
Administrator

March 26, 2013

Certified Mail

Richard Jones
Firestone Polymers
PO BOX 26611
AKRON, OH 44319

Re: NOTICE OF VIOLATION - 2013 FULL COMPLIANCE EVALUATION
Facility ID: 1677010000
Firestone Polymers
Location: 381 W WILBETH ROAD,
AKRON, OH 44301
Summit County

Dear Richard Jones:

On March 19, 2013, I conducted a full compliance inspection of Firestone Polymers. The purpose of the inspection was to evaluate compliance with the terms and conditions of the applicable Federally Enforceable Permits to Operate (PTOs), Permits to Install (PTIs) and state and federal rules and regulations. I would like to thank you for your cooperation during my site visit.

Listed below are "Findings" based upon my observations and conversations with you, my review of the available records at the facility and my review of the submitted reports. The findings are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

1. Finding:

During the review of the records maintained at the facility, it was determined that the January 16, 2009 and October 5, 2009 shipments of mixed hexane solvent did not have the supplier's analysis of the percentage, by weight, of the organic compounds (OC), other than n-hexane, that are classified as hazardous air pollutants (HAPs) for emissions units P005, P016 and P017.

Violation:

Failure to maintain the supplier's analysis of the percentage, by weight, of the OC, other than n-hexane, that are classified as HAPs in each shipment of Mixed Hexane Solvent is considered a violation of Special Terms and Conditions C.3.I for emissions units P005 and P016 and C.4.I for emissions unit P017 of PTO P0102562.



Requested Action:

Akron Regional Air Quality Management District (ARAQMD) requests that Firestone Polymers ensure that all future shipments of Mixed Hexane Solvent have the supplier's analysis of the percentage, by weight, of the OC, other than n-hexane, that are classified as HAPs.

2. Finding:

During the review of the records maintained at the facility, it was determined that on June 5, 2011 part of the pilot flame recordkeeping was missing for emissions units P005, P016 and P017.

Violation:

Failure to continuously record the presence of the pilot flame is consider a violation of Ohio Administrative Code (OAC) rule 3745-21-09(B)(4)(d) which states:

"Any owner or operator of a source referenced in paragraph (B)(4)(a) of OAC rule 3745-21-09 shall install and operate continuous monitoring and recording devices (i.e., for temperature, VOC concentration, arcing of an electric arc ignition system, or presence of a pilot flame) and, if necessary, perform emission tests for the source to enable the recordkeeping required by paragraph (B)(4)(b) of OAC rule 3745-21-09."

Requested Action:

ARAQMD requests that Firestone Polymers immediately comply with the monitoring and recordkeeping requirements of OAC rule 3745-21-09(B)(4).

3. Finding:

During my write-up of the facility inspection, I determined the flare became subject to OAC rule 3745-21-09(ZZ)(1) and OAC rule 3745-21-09(B)(4) when it was replaced on July 8, 2003. OAC rule 3745-21-09(B)(4)(b)(i) requires you to collect and record each day for the source a log or record of the operating time for the capture (collection) system, the flare, the monitoring equipment and the associated source. This recordkeeping requirement was not in PTO P0102562 issued final on December 20, 2007.

Violation:

If the log of the operating times as required above has not been maintained for emissions units P005, P016 and P017, this would constitute a violation of OAC rule 3745-21-09(B)(4)(b)(i).

Requested Action:

If Firestone Polymers is currently not maintaining the above-mentioned recordkeeping for emissions units P005, P016 and P017, ARAQMD requests that Firestone Polymers immediately comply with the monitoring and recordkeeping requirements of OAC rule 3745-21-09(B)(4)(b)(i).

4. Finding:

During my review of the quarterly reports for the facility inspection, I observed that the summary of the operating times for the capture system, the flare, the monitoring equipment and the associated sources was not included in the quarterly deviation reports. This reporting requirement was not in PTO P0102562 issued final on December 20, 2007.

Violation:

Failure to report the summary of the above-mentioned operating times for emissions units P005, P016 and P017 is considered a violation of OAC rule 3745-21-09(B)(4)(c) which states:

“Any owner or operator of a source referenced in paragraph (B)(4)(a) of OAC rule 3745-21-09 shall submit to the director quarterly summaries of the records required by paragraph (B)(4)(b) of OAC rule 3745-21-09. These quarterly reports shall be submitted by April thirtieth, July thirty-first, October thirty-first, and January thirty-first, and shall cover the records for the previous calendar quarters.”

Requested Action:

ARAQMD requests that all future deviation reports submitted by Firestone Polymers contain the summary of the operating time for the capture system, the flare, the monitoring equipment and the associated source for emissions units P005, P016 and P017.

5. Finding:

During the review of the records maintained at the facility, it was determined that when both burners of the flare are not operating there is no record of what was occurring with emissions units P005, P016 and P017 (i.e., not operating).

Requested Action:

ARAQMD requests that Firestone Polymers provided a written record on the flare charts of what is occurring with emissions units P005, P016 and P017 when the flare chart shows both burners are not operating.

6. Finding:

During the review of the records maintained at the facility, it was determined that on July 8, 2008 the temperature recorder did not record the temperature of the thermal oxidizer for emissions unit P017.

Violation:

Failure to continuously record the temperature for emissions unit P017 is considered a violation of OAC rule 3745-21-09(B)(4)(d) and Special Term and Condition C.1 of PTO P0102562 which state:

"The permittee shall operate and maintain a continuous temperature monitor and recorder..."

Requested Action:

ARAQMD requests that Firestone Polymers immediately comply with the monitoring and recordkeeping requirements of OAC rule 3745-21-09(B)(4) and the permit terms and conditions for emissions unit P017.

7. Finding:

During the review of the records maintained at the facility, it was determined that a log or record of the operating time of the capture system and the monitoring equipment for emissions unit P017 was not being maintained.

Violation:

Failure to maintain a log or record of the operating times of the capture system and the monitoring equipment is considered a violation of OAC rule 3745-21-09(B)(4)(b)(i) and Special Term and Condition C.1.b of PTO P0102562 which state:

"The permittee shall record the following information each day when the enclosed combustion device is in operation:

- a. *the average temperature of the exhaust gases from the enclosed combustion device during each of the 8 3-hour blocks of time during the day; and*
- b. *a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit."*

Requested Action:

ARAQMD requests that Firestone Polymers immediately comply with the monitoring and recordkeeping requirements of OAC rule 3745-21-09(B)(4)(B)(i) and the permit terms and conditions for emissions unit P017.

8. Finding:

During my review of the reports for the facility inspection, I observed that the summary of the operating times for the capture system and the monitoring equipment were not included in the deviation reports for emissions unit P017 and the thermal oxidizer.

Violation:

Failure to report the summary of the operating times for the capture system and monitoring equipment for emissions unit P017 and the thermal oxidizer is considered a violation of Special Term and Condition D.2 of PTO P0102562 which states:

“The permittee shall submit a summary of the log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.”

Requested Action:

ARAQMD requests that all future deviation reports submitted by Firestone Polymers contain the summary of the operating time for the capture system and the monitoring equipment for emissions unit P017 and the thermal oxidizer.

9. Finding:

During my review of the reports for the facility inspection, I observed that the summary of the operating times for the capture system, the thermal oxidizer, the monitoring equipment and the associated source were submitted semiannually instead of quarterly for emissions unit P017 and the thermal oxidizer.

Violation:

Failure to submit the summary of the operating times for the capture system, the thermal oxidizer, monitoring equipment and the associated source is considered a violation of OAC rule 3745-21-09(B)(4)(c) which states:

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“Any owner or operator of a source referenced in paragraph (B)(4)(a) of OAC rule 3745-21-09 shall submit to the director quarterly summaries of the records required by paragraph (B)(4)(b) of OAC rule 3745-21-09. These quarterly reports shall be submitted by April thirtieth, July thirty-first, October thirty-first, and January thirty-first, and shall cover the records for the previous calendar quarters.”

Requested Action:

ARAQMD requests that all future quarterly deviation reports submitted by Firestone Polymers contain the summary of the above-mentioned operating times for emissions unit P017 and the thermal oxidizer.

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.

This letter or information pursuant to this letter does not constitute a waiver of the Ohio Environmental Protection Agency's (EPA) authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

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
Brian Dickens, Region 5 U.S. EPA