Permit Evaluation Report 32875
OMNOVA Solutions Inc.
1667000007
April 16, 2011

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Ohio EPA, Division of Air Pollution Control

Permit Evaluation Report

Facility ID: 1667000007
Facility Name OMNOVA Solutions Inc.
Submitted: No

Report ID 32875
Report Type Permit Evaluation Report
Report Status Draft

Reporting Period 01/01/2010-12/31/2010
Due Date: **Feb 15, 2**

dditional Information & Corrections

lease list below any additional information you need to communicate. At a minimum, identify if you have any EU(s) that were permanently shutdown, EU(s) that will not be inst r modified, or EU(s) not in operation during the reporting period. See the 'PER Form FAQ' document for an explanation and examples from the system's Reference Page.

2010 Permit Evaluation Report (Corrected)
Emissions Unit P015 was not installed during the reporting period.
This report contains corrections that were not reported in Permit Evaluation Report ID 30769 submitted electronically on February 14, 2011.

etailed EU Information

he Emission Unit(s) listed below has been issued a PTIO(s). Complete the table below by identifying whether deviations or exceedances of operational restrictions(OR)/emissi nitations(EL) and/or monitoring, record keeping or reporting (MRR) occured by selecting either Yes or No. If any of the date fields do not identify an actual date, you are requir pdate your Facility Profile for each applicable emissions unit(s). Failure to update your Facility Profile may result in an incomplete report submittal.

			Dates			Deviations or Exceedances From:		
DAPC EU ID	DAPC EU Description	Permit Number: Effective Date	Completion of Initial Installation	Begin Installation/ Modification	Commence Operation after Installation or Latest Modification	OR/EL	MRR	Notes
P004	Latex Polymerization & Degassing Process	P0101911: 04/27/2009	Jun 01, 1974	Jun 01, 1974	Dec 01, 1995	No	Yes	
P013	Wastewater Steam Stripping Column	P0101911: 04/27/2009	Sep 01, 1992	Sep 01, 1992	Oct 01, 1992	No	Yes	
P014	Butadiene distillation column, overhead condenser, reflux drum, reboiler, pumps; vented to an existing	P0101911: 04/27/2009	May 01, 2000	May 01, 2000	May 01, 2000	No	Yes	EU was only operated for about six weeks in 2010.

	Process Combustion Corp Thermal Incinerator							
P101	Pilot Plant 30-gallon Reactors	P0101911: 04/27/2009	Jun 30, 1969	Jun 30, 1969	Jun 30, 1969	No	Yes	
P103	Pilot Plant Latex Strippers	P0101911: 04/27/2009	Jun 30, 1950	Jun 30, 1950	Jun 30, 1950	No	Yes	
P105	Pilot Plant Acrylic Latex Polymerization	P0101911: 04/27/2009	Jun 30, 1967	Jun 30, 1967	Jun 30, 1967	No	Yes	
P106	Pilot Plant In-Mold/Specialty Coatings and Fluorinated Monomers/Polymers	P0101911: 04/27/2009	Jun 01, 1966	Jun 01, 1966	Jun 01, 1966	No	Yes	
P110	Pilot Plant Polymerization Process #1	P0101911: 04/27/2009	Mar 01, 2000	Mar 01, 2000	May 01, 2000	No	Yes	
P115	Pilot Plant Polymerization Process #6	P0101911: 04/27/2009	Mar 01, 2000	Mar 01, 2000	May 01, 2000	No	Yes	
P015	SA Polymerization Process	P0105137: 08/31/2009				No	No	EU construction/installation did not begin during the reporting period.

eviation, Exceedance, or Visible Emissions Detail

dditional information is required for each deviation or exceedance that prompted a 'yes' answer in the Detailed EU Information table above and for any visible emissions (VE) icident that occured during the reporting period. This information may be identified through either the following table or by attaching the information below. When attaching a ocument in lieu of using the table below, the document must meet the content requirements identified in the hard copy PER you received. Examples are available in the 'PER I ocument available from the system's Reference Page.

Dev/Exc/VE ID	DAPC EU ID	Start Date	End Date	Duration	Description of Deviation or Exceedance and Probable Cause	Description of Corrective Actions none, describe wh not
11332	P004, P013, P014, P101, P103, P105, P106, P110, P115	Sep 09, 2010	Oct 27, 2010		47 days	Deviation: The total hydrocarb analyzer used t monitor the concentration o organic compoun in the thermal oxidizer stack

						failed. Probable Cause: An unplanned pov outage at the facility damage circuit board i the analyzer.
The analyzer was returned to the manufacturer for warranty repairs and was put back in service on 10/27/2010.	11333	P004, P013, P014, P101, P103, P105, P106, P110, P115	Jan 01, 2010	Apr 20, 2010		110 days
Deviation: The thermal oxidizer combustion temperature was not recorded because the strip chart recorder was inoperable. Probable Cause: The strip chart recorder failed.	A Yokogawa electronic datalogger was installed to monitor and record the thermal oxidizer combustion temperature.	11334	P004, P013, P014, P101, P103, P105, P106, P110, P115	Jan 01, 2010	Apr 20, 2010	
110 days	Deviation: The downtime of the strip chart recorder for the thermal oxidizer combustion temperature was not logged. Probable Cause: Inadequate employee training.	No corrective actions were completed in 2010 relative to the logging of the downtime of the strip chart recorder because employees were not trained before the end of the year. However, a Yokogawa electronic datalogger was installed in April 2010 to monitor and record the thermal oxidizer combustion temperature, thus eliminating the need for the strip	11335	P004, P013, P014, P101, P103, P105, P106, P110, P115	Mar 29, 2010	Dec 31, 2010

		chart recorder and rectifying the permit deviation.				
	278 days	Deviation: A leaking valve was found on 3/29/10 during LDAR monitoring. It was repaired, and the post-repair leak rate was entered on the checksheet. However, a Leak Repair Log sheet was not filled out, as required by the air emissions permits. Probable Cause: Inadequate employee training.	All employees who conduct LDAR monitoring, as well as their supervisors, had been previously trained to complete a Leak Repair Log sheet each time a leaking component is found by monitoring or by visual/audible/olf actory methods. This deviation was an oversight by the monitoring technician to complete the Leak Repair Log sheet and attach it to the LDAR checksheet when he turned it in.	11336	P004, P013, P014, P101, P103, P105, P106, P110, P115	Nov 29, 2010
Dec 31, 2010		33 days	Deviation: A leaking valve was found on 11/29/10 during LDAR monitoring. It was repaired, and the post-repair leak rate was entered on the checksheet. However, a Leak Repair Log sheet was not filled out, as required by the air emissions permits. Probable Cause: Inadequate employee training.	All employees who conduct LDAR monitoring, as well as their supervisors, had been previously trained to complete a Leak Repair Log sheet each time a leaking component is found by monitoring or by visual/audible/olf actory methods. This deviation was an oversight by the monitoring technician to complete the Leak Repair Log sheet	11330	P004, P013, P01 P101, P103, P10 P106, P110, P11

				and attach it to the LDAR checksheet when he turned it in.		
Jan 01, 2010	Dec 31, 2010		365 days	Deviation: Monthly records were not maintained for total facility emissions of each Hazardous Air Pollutant (HAP) and combined HAP; monthly records were not maintained for the rolling, 12-month summation of the total facility emissions for each individual HAP and combined HAP; monthly records were not maintained for the rolling, 12-month summations of the monthly emissions. Probable Cause: Failure to comply with the terms and conditions of the various permits requiring monthly and rolling, 12-month recordkeeping (annual emissions of individual HAP, combined HAP and total facility emissions were being maintained).	No corrective actions were completed in 2010 because the monthly recordkeeping deficiencies were not recognized. Only annual emissions records were being maintained.	11331
P004, P013, P014, P101, P103, P105, P106, P110, P115	Feb 26, 2010	Mar 30, 2010		32 days	Deviation: The total hydrocarbon analyzer used to monitor the concentration of organic compounds in the thermal	The analyzer wa returned to the manufacturer fo warranty repair and was put bac in service on 3/30/2010.

					oxidizer stack gas failed. Probable Cause: A plugged filter in the unit prevented sample flow.	

ttachments

Attachment ID	Description	Type	Modified By	Last Modified
No records found				