



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties  
117 South Main Street, Dayton, Ohio 45422-1280  
937-225-4435 — Fax: 937-225-3486  
www.rapca.org

July 8, 2009

**Certified Mail**

Mrs. Chapman  
Citywide Towing and Auto Recovery  
928 Dayton Road  
Springfield, Ohio 45506

**RE: Ohio EPA Facility ID 0812100588  
Reporting Requirements for Emissions Units P001-Aluminum Sweat Furnace**

Dear Mrs. Chapman:

**WARNING LETTER**

On December 1, 2008, the Regional Air Pollution Control Agency (RAPCA) issued a certified letter to the Citywide Towing and Auto Recovery (Citywide) facility, located at 930 Dayton Avenue in Springfield, Ohio, indicating that Citywide was not meeting the reporting requirements stated in Permit to Install (PTI) 08-04739, modified July 24, 2007, and the Permit to Operate (PTO), issued May 23, 2008, for emissions unit (EU) P001 (Aluminum Sweat Furnace). The letter was received by your facility on December 2, 2008 and I have enclosed a copy for your review. On June 3, 2009, RAPCA conducted an inspection of Citywide to determine if the facility was operating EU P001 in accordance with permit terms and conditions. During this inspection, a Citywide employee indicated that EU P001 was not *currently* being operated.

Part II.B.1 of PTI 08-04739 and the PTO issued May 23, 2008, states that the average combustion temperature, for any three (3) hour block of time when EU P001 is in operation, shall not be less than 1650 degrees (°) Fahrenheit (F). Part II.D states that Citywide shall submit **quarterly deviation (excursion) reports** that:

- a) identify all periods of time during which the temperature of the smelting furnace afterburner was not maintained at or above the required temperature (1650°F) as specified in Section B.1 of the permit and,
- b) include a log of downtime for the afterburner and/or monitoring equipment when EU P001 was in operation.

RAPCA is aware that Citywide is not *currently* operating EU P001. For any reporting period during which this EU is not operated, a report stating such should be submitted to satisfy the *quarterly* permit reporting requirements.

Additionally, Citywide is subject to **40 CFR 63 Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production)**, which requires the following reports be submitted:

**Semi-annual reports:**

**1. SSM (Startup, Shutdown, Malfunction) Report**

-Only required if actions taken during an SSM are not consistent with the procedures in

the plan for startup and shutdowns when an emission limit is exceeded or a malfunction occurs. **If no startup, shutdown or malfunction occurs in a reporting period, then no SSM report is required**

2. Excess Emissions and CMS Report

-Only required if excess emissions or control parameter exceedances occurred during a reporting period. **If the aluminum sweat furnace was not operated during a reporting period, this report is not required.**

3. Summary Report

-These reports are required every semi-annual reporting period and should include:

- a) the name and address of the facility,
- b) identification of the hazardous air pollutant (HAP) being monitored: N/A,
- c) reporting period dates: ex. **January 1 – June 30, 2009**,
- d) description of the emission unit: **aluminum sweat furnace**,
- e) emissions and operating parameter limitations:
  - 1) Afterburner Temperature Minimum of 1650°F, as a 3-hour average
- f) monitoring equipment (temperature monitor and recorder) manufacturer name and model number,
- g) date of most recent monitoring equipment certification or audit,
- h) total operating time of the aluminum sweat furnace,
- i) summary of emissions from the aluminum sweat furnace
- j) monitoring equipment summary:
  - 1) duration of monitoring equipment downtime as a percent (%) of aluminum sweat furnace operating time
  - 2) breakdown of total monitoring equipment downtime due to malfunctions, calibrations, other known causes and other unknown causes
- k) description of any changes in monitoring equipment, processes or controls (afterburner) since last reporting period
- l) name, title, signature of responsible party (owner) and date

40 CFR 63 Subpart RRR also requires that Citywide submit a one-time **Notification of Compliance Status Report** within 60 days after startup of EU P001. If EU P001 has ever been operated, this report should have been submitted within 60 days of the first date of operation. If EU P001 has never been operated, Citywide is required to submit this report within 60 days once this unit becomes operational. I have enclosed template copies of this report, as well as an **Excess Emissions/CMS and Summary Report** that you may fill out and submit to RAPCA.

To date, RAPCA has not received any of the required quarterly or semi-annual reports pertaining to EU P001 (aluminum sweat furnace). Failure to submit the required reports is a violation of PTI 08-04739, the PTO issued May 23, 2008, 40 CFR 63 Subpart RRR, and Ohio Revised Code 3704.05.

Due to the fact that RAPCA is unclear of the operating history of EU P001 and is also unaware of Citywide's intentions as far as planned future operations of this EU, RAPCA requests that within fourteen (14) days after receipt of this letter, Citywide respond to the following questions in writing:

1. On what date was EU P001 installed?
2. On what date was the monitoring equipment associated with EU P001 installed?

Citywide Auto Recovery and Towing  
July 8, 2009  
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3. If EU P001 has ever been operated:
  - a. On what dates did this unit operate?  
\*If EU P001 has never been operated, please submit a written statement indicating this.
4. What are Citywide's intentions as far as future operations of EU P001?

In addition, RAPCA also requires that Citywide submit the following within 14 days after receipt of this letter: all delinquent quarterly and semi-annual reports, as required; a compliance plan to ensure that all future reports will be submitted in a timely manner, and; a **Notification of Compliance Status Report** if EU P001 was ever operated prior to the last 60 days. RAPCA appreciates your prompt attention to the issues addressed. If you have any questions, please feel free to contact me directly at (937)225-4453.

Sincerely,



Lesley A. Jenkins  
Air Pollution Control Specialist

cc: Jeff Canan, RAPCA  
Tom Kalman, OEPA  
Lisa Holscher, USEPA

## Summary of Citywide Required Reports

1. Reports required regardless of unit (ever) being operational:

**Quarterly Deviation Reports** – may be satisfied with a written statement indicating that unit is not operational

Quarter 1 (January 1 – March 31); Report due April 30

Quarter 2 (April 1 – June 30); Report due July 31

Quarter 3 (July 1 – September 30); Report due October 31

Quarter 4 (October 1 – December 31); Report due January 31

**Summary Reports** – include information listed in letter

Semi-annual reporting periods are:

January 1 – June 30; Report due within 60 days of end of period

July 1 – December 31; Report due within 60 days of end of period

2. Reports required only if the EU became/is operational during a reporting period and the following conditions are met:

**Notification of Compliance Status** – due within 60 days of startup of aluminum furnace

**SSM Report** – only required if startup, shutdown or malfunction occurs in a semi-annual reporting period; due within 30 days of end of period

**Excess Emissions & CMS Reports** - Only required if excess emissions or control parameter exceedances occurred during a semi-annual reporting period; due within 60 days of end of period



**REGIO**  
Serving

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

MRS CHAPMAN  
CITYWIDE TOWING & AUTO RECOVERY  
928 DAYTON ROAD  
SPRINGFIELD, OH 45506

2. Article Number  
(Transfer from service label)

7008 1300 0001 9322 4516

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

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- Agent
- Addressee

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Certified Mail

Mrs. Chapman  
Citywide Towing and Auto Recovery  
928 Dayton Road  
Springfield, Ohio 45506

RE: Ohio EPA Premises No. 0812100588  
Quarterly Reporting Requirements for Emissions Unit P001 - Aluminum Sweat Furnace

Dear Mrs. Chapman:

The Regional Air Pollution Control Agency (RAPCA) has recently reviewed our files to determine whether facilities are in compliance with the reporting requirements identified in their permit terms and conditions. Upon review of Citywide Towing and Auto Recovery's files, RAPCA identified that emissions unit (EU) P001 (Secondary Aluminum Sweat Furnace with Afterburner) requires quarterly reports be submitted.

Specifically, Part II.B.1 of Permit to Install and Operate (PTIO) P0091643, issued May 23, 2008, states that the average combustion temperature, for any three (3) hour block of time when EU P001 is in operation, shall not be less than 1650 degrees (°) Fahrenheit (F). Part II.D.1 of PTIO P0091643 states that the permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the temperature of the smelting furnace afterburner was not maintained at or above the required temperature (1650°F) as specified in Section B.1 of the permit. Additionally, Part II. D.3 states that the permittee shall submit quarterly summaries that include a log of downtime for the afterburner and/or monitoring equipment when EU P001 was in operation.

To date, RAPCA has not received any quarterly reports for this emissions unit. Citywide Towing and Auto Recovery is hereby notified of the failure to submit the required quarterly reports for emissions unit P001. Failure to submit these reports is a violation of PTIO P0091643, issued May 23, 2008, and Ohio Revised Code (ORC) 3704.05. RAPCA requires that within thirty (30) days of receipt of this letter, Citywide Towing and Auto Recovery submit the required quarterly reports. The requested reports shall cover third (3<sup>rd</sup>) and fourth (4<sup>th</sup>) quarter 2006, 2007 and first (1<sup>st</sup>) through third (3<sup>rd</sup>) quarter 2008.

RAPCA appreciates your cooperation in this matter and if you have any questions, feel free to contact me at 937-225-4453.

Sincerely,  
*Lesley A. Jenkins*  
Lesley A. Jenkins  
Air Pollution Control Specialist

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928 DAYTON, ROAD  
SPRINGFIELD, OH 45506

2. Article Number  
(Transfer from service label)

7008 1300 0001 2695 0499

PS Form 3811, February 2004

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CITYWIDE TOWING & AUTO RECOVERY  
928 DAYTON, ROAD  
SPRINGFIELD, OH 45506

PS Form 3800, August 2006

See Reverse for Instructions