



State of Ohio Environmental Protection Agency

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March 13, 2008

Robert Michael Sr.
Safety & Environmental Manager
Crown Battery Manufacturing Co.
1445 Majestic Dr.
P.O. Box 990
Fremont, Ohio 43420

Subject: Warning for multiple baghouse pressure drop deviations at Crown Battery Manufacturing Company (0372030089) based on review of quarterly deviation reports from 2006 to 2008.

Dear Mr. Michael Sr.

This warning letter is being issued for the company's multiple baghouse pressure drop deviations from baghouses #1-3 and the cartridge house controlling emissions units P016-P028 and P034-P037. Permit to Install (PTI) 03-16167 was issued on August 12, 2004 for these emissions units. This letter outlines the history of the pressure drop issues and requests some additional information from the company.

As the company is aware, Crown Battery Manufacturing Company (Crown Battery) was contacted on September 7, 2006 regarding pressure drop readings that were reported out of range for baghouses #2 and #3. After receiving responses from the company dated September 8 & 11, 2006, the Ohio EPA told the company to ensure that bags are replaced sooner. The first quarterly report following this correspondence, 3rd quarter 2006, showed pressure drop deviations on baghouse #2 for each day during the quarter and one deviation for baghouse #1. There was a comment on the log sheet that all bags were replaced for baghouse #2 on the last day of the quarter.

PTI 03-16167 states that the pressure drop range for each baghouse and the cartridge house should be 1 to 2.5 inches of water. Upon review of the 3rd quarter 2006 report, the company was contacted to verify the correct pressure drop ranges for the three baghouses and the cartridge house since the log sheets identify a range of 2 to 3.5 inches of water for baghouses #1-3 and 1 to 2.5 inches of water for the cartridge house. The company investigated this issue and contacted the manufacturer of the baghouses and came to the conclusion that the baghouses should be operated within the 2 to 3.5 range. This is also the range that the units were operating at during the most recent compliance tests that showed compliance in 2002 and 2003. To resolve this discrepancy, in a letter dated January 31, 2008, Crown Battery requested an administrative modification to PTI 03-16167 to change the pressure drop range for the three baghouses.

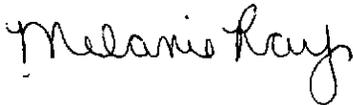
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In reviewing quarterly reports from 4th quarter 2006 to 4th quarter 2007, based on the correct pressure drop ranges as determined above, there were multiple pressure drop deviations from all three baghouses and the cartridge house. Reports for 1st quarter 2007 and 1st quarter 2008 could not be located and this office requests those reports be submitted along with a response to this letter.

In addition to the 1st quarter 2007 and 2008 reports, Crown Battery will need to submit a compliance plan for how they plan to prevent future pressure drop deviations. The plan should detail the steps the company will take to correct these deviations. This information should be submitted by **April 11, 2008**.

Should the company have any questions and/or comments concerning this letter, please feel free to contact this writer at the above referenced address or call (419) 373-4111.

Sincerely,



Melanie L. Ray
Division of Air Pollution Control

/csl

pc: Don Waltermeyer, DAPC, NWDO
NWDO Sandusky County correspondence file