



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 11, 2008

CERTIFIED MAIL

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

Subject: Notice of Violation (NOV) for pressure drop deviations and installation of three new casting machines without first obtaining required permits at Crown Battery Manufacturing Company (0372030089) based on quarterly report review and August 28, 2008 facility visit.

Dear Mr. Michael Sr.:

This letter shall serve as a NOV for pressure drop deviations on the cartridge house controlling the SLI casting machines, emissions units P034-P037 and three unpermitted sources, for the installation of three casting machines without first obtaining the required permits and for violations of 40 CFR, Part 60, Subpart KK. Emissions units P034-P037 are permitted under PTI 03-16167. The company obtained an administrative modification on April 24, 2008, to change the pressure drop range for the cartridge house controlling these sources from 2-3.5 inches of water to 1-2.5 inches of water. *incorrect. Cartridge house remained at 1-2.5. P016 - P033 changed from 1-2.5 to 2-3.5.*

A review of the company's 2nd quarter 2008 deviation report showed multiple pressure drop readings greater than 2.5 on the cartridge house in April in violation of the terms and conditions of the permit and ORC 3704.05. Crown Battery Manufacturing Company (Crown Battery) was also issued a warning letter on March 13, 2008 for pressure drop deviations from all three baghouses and the cartridge house. This letter requested a compliance plan to be submitted by April 11, 2008. A compliance plan was never received and since additional deviations were discovered in the 2nd quarter 2008 report, a visit was made to the facility on August 28, 2008 to observe the control devices and discuss the quarterly reports with the company.

In discussing the pressure drop deviations with Mr. Jeff Kramer, it was mentioned that the readings most likely went back down once they stepped up the blow downs to increase the frequency that the cartridges were being cleaned off. It was agreed at that time that the shake down of the cartridges should be done on a more frequent basis and before the pressure drop readings approach the upper end of the permitted range. The company will need to develop a compliance plan in order to avoid future violations. This plan should be submitted by **September 25, 2008**, and detail the steps the company will take to prevent future deviations.

At the time of our visit, we were made aware of three new casting machines that were installed on October 31, 2007. These emissions units are tied into the cartridge house and were installed without first obtaining proper permits. This is a violation of OAC rule 3745-31-02 and 3704.05.

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In order to resolve this violation, Crown Battery must submit complete PTIO applications no later than **October 10, 2008**. Please be aware that the company's current PTI and MACT subpart PPTPPP both require prompt investigation into the cause of each deviation as well as immediate corrective action to bring the control equipment within the acceptable pressure drop range. This information must also be documented and reported accordingly. Please review both the PTI and MACT and ensure all requirements are followed if any future deviations occur.

The new casting machines are also subject to 40 CFR, Part 60, Subpart KK which requires a notification of construction and startup. A notification of the commencement date of construction was due 30 days after such date and the notification of the initial startup date was due no later than 15 days after such date. Neither of these notifications were received which is a violation of the rule. Both notifications must be submitted immediately in order to resolve this violation.

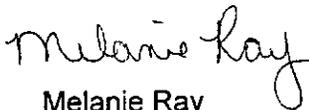
The company is also in violation of 40 CFR, Part 60.8 which requires performance testing to be done within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. The company must submit an Intent to Test and contact the Northwest District Office immediately to coordinate emissions testing in order to come into compliance with this standard.

In addition to the above mentioned items, the company must also submit deviation reports for 1st quarters 2007 and 2008. As stated in the previous warning letter, these reports could not be located in our files. As discussed during our visit, please review the reporting requirements in PTI 03-16167 and supply the required information instead of monthly log sheets. The NWDO also requests that the company review its operations to determine if any other emissions units have been installed that do not have proper permits and, if so, if the sources meet the definition of an affected facility as identified in 40 CFR, Part 60.370. This information should be submitted by **September 25, 2008**.

The submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address or call (419) 373-4111.

Sincerely,



Melanie Ray
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, USEPA, Region 5, Air and Radiation Division
Brian Riedmaier, DAPC-NWDO
NWDO follow-up File
~~DAPC-NWDO Sandusky County Correspondence file.~~

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1. Article Addressed to:
*MR. ROBERT MICHAEL SA.
 SAFETY & ENVIRONMENTAL MANAGER
 OLSON BATTERY MANUFACTURING CO.
 1445 MAJESTIC DRIVE
 P.O. Box 990
 FREMONT, OHIO 43420*

7006 3450 0001 0667 4926

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 or PO Box No.:
 City, State, ZIP+4: *FREMONT OH 43420*
 See Reverse for Instructions
 PS Form 3800, August 2005