



**Environmental
Protection Agency**

John R. Kasich, **Governor**

Mary Taylor, **Lt. Governor**

Scott J. Nally, **Director**

May 2, 2012

CERTIFIED MAIL

Mr. James F. Anderson
Crown Battery Manufacturing Company
1445 Majestic Drive
Fremont, Ohio 43420

Subject: Notice of Violation (NOV/non-HPV) for multiple violations discovered as a result of facility's self-audit and subsequent facility inspection at Crown Battery Manufacturing Company (0372030089)

Dear Mr. Anderson:

The Ohio EPA, Northwest District Office (NWDO) received an environmental audit from Crown Battery Manufacturing Company (Crown) disclosing alleged air pollution violations on December 14, 2011. A facility inspection was then conducted on February 10, 2012, to discuss and investigate the alleged violations. As a result of the company's self-audit, the facility inspection and a review of the company's files, the following violations were discovered:

1. There are several unpermitted sources at the facility that require a permit to install and operate (PTIO). Installation of an emissions unit without first obtaining proper permits is a violation of OAC rule 3745-31-02 and ORC 3704.05. The unpermitted sources at the facility are as follows:
 - a. Three SLI grid casting machines (company ID #'s 13-15). Please submit PTIO applications for these three emissions units as soon as possible in order to resolve this violation.
 - b. The facility operates three paste mixers and only two have permits. The mixers are currently each controlled with a scrubber. The company has discussed its plans to remove the scrubbers and install one or multiple baghouses to control these emission units. Prior to submitting an application for the unpermitted mixer, the company should submit a timeline and plans for upgrading the control devices. This plan should be submitted by May 16, 2012. If the company does not have plans to upgrade the control devices, however, PTIO applications must be submitted as soon as possible in order to resolve this violation.

- c. There are four lead oxide storage silos at the facility that do not have permits. PTIO applications need to be submitted as soon as possible for the silos in order to resolve this violation.
 - d. The company currently has permits for one industrial battery 3-process operation assembly line (P031) and two SLI battery 3-process operation lines (P032-P033), however, the audit disclosure states that there are five 3-process lines. PTIO applications are required for the unpermitted lines. These applications should be submitted as soon as possible in order to resolve this violation.
 - e. A PTI for the lead oxide mills (P014 & P015) was issued on March 20, 1996, however a permit to operate (PTO) was not issued and PTO applications could not be located. PTIO applications must be submitted as soon as possible for these emissions units in order to resolve this violation. The company should check the box identifying these as renewal applications.
2. The company has failed to perform required emissions tests as follows:
- a. The four lead oxide silos have not been tested to show compliance with the NSPS, Subpart KK standards for lead and visible emissions. Failure to conduct the required testing is a violation of 40 CFR Part 60.8 and ORC 3704.05. Emission testing is also required per the Lead Acid Battery Manufacturing area source MACT, 40 CFR Part 63, Subpart P, therefore, the company is also in violation of the MACT regulation. Crown must submit an Intent to Test (ITT) as soon as possible in order to resolve this violation.
 - b. The paste mixers (P029, P030 & 3rd unpermitted mixer) have also not been tested to show compliance with the NSPS and MACT standards for lead and visible emissions in violation of 40 CFR Part 60.8, 40 CFR Part 63.11423 and ORC 3704.05. As discussed above, the company has mentioned its plans to remove the scrubbers controlling the mixers and replace them with one or multiple baghouses. The need to test the mixers prior to a change in control devices will be dependent upon the timeline and information provided by the company as required above.
 - c. Visible emission testing, as identified in the testing requirements of NSPS, Subpart KK, has not been performed for emissions units P016-P028, P034-P040 and P031.

Again, this is a violation of 40 CFR Part 60.8, 40 CFR Part 63.11423 and ORC 3704.05. An ITT should be submitted as soon as possible in order to resolve this violation.

- d. Permit to Install (PTI) 03-13450, issued July 10, 2001, which included emissions units P032-P033 required lead and PE testing be performed. Lead and visible emission testing is also required per NSPS, Subpart KK and MACT, Subpart P. Past correspondence from the company states that testing was conducted in compliance with the permit, however, this office has no record of a performance test being done. Failure to conduct the required emission tests is a violation of PTI 03-13450, 40 CFR Part 60.8, MACT Subpart P and ORC 3704.05.
 - e. The lead oxide mills (P014 & P015) have not been tested to show compliance with MACT, Subpart P. The company was granted an exemption from the requirement to test these emission units in a letter dated August 2, 1996, however, the MACT requires emission testing unless a previous, compliant test has already been performed. Therefore, stack testing must be conducted to show compliance with the MACT. Crown should submit an ITT as soon as possible in order to resolve these violations.
3. NSPS, Subpart KK requires all scrubber-controlled affected facilities to install a pressure drop monitor and record readings every 15 minutes. The scrubbers controlling the three paste mixers do not have monitors and therefore, readings have not been taken and recorded. The information we have on record shows the mixers were installed in 1988, so the company has been in violation of this requirement since their installation.
 4. The company installed a 94-HP natural gas-fired emergency generator without first obtaining a permit in violation of OAC rule 3745-31-02. A permit by rule (PBR) request was submitted for the generator on February 17, 2012 with a PBR being issued on February 21, 2012. The issuance of the PBR resolves this violation and nothing further is required at this time.
 5. The baghouses controlling the lead oxide mills and storage silos do not have pressure drop monitors installed to measure differential pressure drop. The MACT requires the installation, maintenance and operation of pressure drop monitors during all times when the process is operating. The pressure drop shall be recorded at least once per day.

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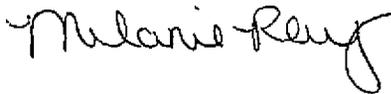
The company must install monitors on all baghouses and begin recording daily readings in order to be compliance with the MACT. The pressure drop should be maintained within the acceptable manufacturer's specified range.

6. Semiannual inspections and maintenance is required by the MACT on all baghouses and the results are to be recorded. Crown has stated that maintenance inspections of defined parameters are performed on a scheduled basis, however, documentation has not been kept of the completed inspections. Failure to conduct and record the baghouse inspections is a violation of the MACT. The company must begin conducting and recording the maintenance inspections immediately. If Crown has already begun the inspections and documentation, please provide the date this began.

Please provide a written response to this NOV no later than May 16, 2012. In addition to the specific information requested above, the response should include a timeline for submitting any required applications, conducting required stack tests and installation of required baghouse pressure drop monitors. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the 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.

Please feel free to contact me with any comments and/or questions at 419.373.4111 or email melanie.ray@epa.state.oh.us.

Sincerely,



Melanie Ray
Division of Air Pollution Control

/llr

pc: NWDO Follow-up File
Certified Mail Receipt Number 7009 1410 0001 1843 8078

ec: Jennifer Jolliff, NWDO-DAPC
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