

CITY OF TOLEDO



DEPARTMENT OF PUBLIC UTILITIES

November 22, 2011

CERTIFIED MAIL

Ms. Jawonia Reynolds
Mobis North America, LLC.
3900 Stickney Avenue
Toledo, Ohio 43608

Re: Notice of Violation

Dear Ms. Reynolds:

Enclosed, please find a "Notice of Violation" for Mobis North America, LLC (Ohio EPA Facility ID 0448011729, P001 – Misc. solvents and cleaners) located at 3900 Stickney Avenue. Please review this document carefully as some action is required on your part.

If you have any questions, please feel free to contact me.

Sincerely,

Mary Lehman-Schmidt, P.E.

Enclosure

cc: Tyson Stoll, Ohio Plant Manager, Mobis North America, LLC.
Timothy D. Murphy, Commissioner, Toledo Environmental Services (TDOES)
Karen Granata, P.E., Chief of Air Resources, TDOES
Joyce Anagnos, Senior Attorney, Law Department
John Paulian, OEPA
William MacDowell, USEPA Region V

Timothy D. Murphy, Commissioner
DIVISION OF ENVIRONMENTAL SERVICES
Quilter Environmental Center
348 South Erie Street, Toledo, Ohio 43604-8633 USA
Telephone: 419-936-3015 Fax: 419-936-3959 E-mail: tim.murphy@toledo.oh.gov

NOTICE OF VIOLATION

November 22, 2011

The City of Toledo Division of Environmental Services hereby serves notice that:

Mobis North America, LLC
3900 Stickney Avenue
Toledo, Ohio 43608

has violated the following environmental laws, orders, rules, or regulations on the indicated dates at the above address.

Dates of Violation(s)

November 17, 2011 - ongoing

<u>Regulation(s) violated</u>	<u>Description of Source(s) and Violations(s)</u>
ORC 3704.05 Prohibited Acts. (C) No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions.	Quarterly deviation reports indicated compliance with all the terms and conditions of the facility air permits. During the inspection of Mobis North America, LLC. on 11/17/2011, the facility failed to provide adequate records to demonstrate compliance with permit terms d)(1) through d)(3) for P001 – Misc. solvent and cleaners.

The above violation(s) may subject the violator to penalties of up to \$25,000 per violation. It is possible that a penalty may be assessed in this case. If a penalty is to be assessed, the amount will be determined after your response is reviewed.

Required Actions

Within 2 weeks of receipt of this letter, you shall:

1. Abate the violation(s) or provide for an acceptable remedy.
2. Reply in writing to this Notice of Violation. The reply shall include:
 - a. description(s) and date(s) of action(s) taken thus far to abate the violation(s).
 - b. description(s) and expeditious time schedule of action(s) yet to be taken to remedy the violation(s).
 - c. description(s) of action(s) taken or to be taken to prevent recurrence of the violation(s).

Recommended Actions

Within 4 weeks of receipt of this letter:

1. The facility shall submit appropriate documentation corroborating the status of compliance reported for the terms and conditions d)(1) through d)(3) for P001 (misc. solvents and cleaners) i.e. all reporting periods for the last 2 years where the 5.8 tons, per rolling, 12-months VOC limit was reported in compliance with the permit terms and conditions.
2. Revise the monitoring and recordkeeping procedures to comply with the permit terms and conditions d)(1) through d)(3).

Your written response and any questions regarding this Notice of Violation should be directed to Mary Lehman-Schmidt at the Division of Environmental Services, 348 S. Erie Street, Toledo, Ohio 43604

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