

CITY OF TOLEDO



DEPARTMENT OF PUBLIC UTILITIES

December 9, 2009

CERTIFIED MAIL

Mr. John Peters
Production Manager
Cenveo, Inc.
1635 Coining Drive
Toledo, Ohio 43612

11240

Re: November 3 Notice of Violation

Dear Mr. Peters:

On December 7, 2009 our office received Cenveo's written response to the November 3 Notice of Violation. The response indicates that the violations were remedied by submission of reports for first, second and third quarter reports on November 9. The November 9 reports submitted by Cenveo do not address all reporting deficiencies previously outlined by our office to Cenveo and Cenveo's consultant.

Within 1 week of receipt of this letter, please re-submit the first through third quarter 2009 quarterly reports electronically via Ohio EPA's eBusiness Center and include the following information in the reports.

K002

Section II.D.2 of Permit to Install 04-01495 for K002 requires reporting of exceedances of the following material usage and VOC content restrictions: 80,000 pounds ink per rolling, 12-month period and 49.5% VOC by weight; 2,200 gallons fountain solution per rolling, 12-month period and 1.97 lb VOC/gal; and 2,000 gallons cleanup solvent per rolling, 12-month period and 3.35 lb VOC/gal. The November 9 reports specify the pounds per month and, pounds per quarter usages, and VOC content, but do not specify if there were deviations of the rolling, 12-month usage limitations.

Please specify in the revised reports whether or not there were any deviations of the following rolling, 12-month usage restrictions:

- 80,000 pounds of ink per rolling, 12-month period;

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

- 2,200 gallons of fountain solution per rolling, 12-month period; and
- 2,000 gallons of cleanup solvent per rolling, 12-month period.

If there were deviations, please specify each month during which the deviation occurred along with the rolling, 12-month usage rate for each month during which a deviation occurred.

Section II.D.3 of Permit to Install 04-01495 for K002 requires reporting of the following:

- all 3-hour blocks of time (when the emissions unit was in operation) during which the minimum catalytic incinerator temperature was more than 50 degrees F below that temperature established during the most recent emission test demonstrating compliance. If there were no periods when the emissions unit was in operation during which the minimum catalytic incinerator temperature was more than 50 degrees F below that temperature established during the most recent emission test demonstrating compliance, then please indicate so in the report;
- all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the difference established during the most recent emissions test that demonstrated compliance. If there were no periods when the emissions unit was in operation during which the average temperature difference across the catalyst bed was less than 80 percent of the difference established during the most recent emissions test that demonstrated compliance, then please indicate so in the report;
- any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit was in operation. If there were no periods of downtime for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit was in operation, then please indicate so in the report; and
- a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit.

Please include the above information required by Section II.D.3 of PTI 04-01495 for K002 in the revised reports.

K009

Permit to Install 04-01495 requires reporting of deviations of the following material usage restrictions:

- 80,000 pounds ink per rolling, 12-month period;
- 2,200 gallons fountain solution per rolling, 12-month period;
- and 2,000 gallons cleanup solvent per rolling, 12-month period.

The November 9 reports specify the monthly and quarterly usages, but do not specify if

there were any deviations of the rolling, 12-month usage restrictions.

Please specify in the revised reports if there were any deviations of the rolling, 12-month usage restrictions. If there were deviations, please specify each month during which the deviation occurred along with the rolling, 12-month usage rate for each month during which a deviation occurred.

K012

Permit to Install and Operate P0103863 requires reporting of deviations of the following material usage restrictions: 80,000 pounds ink per rolling, 12-month period; 2,200 gallons fountain solution per rolling, 12-month period; and 2,000 gallons cleanup solvent per rolling, 12-month period.

The November 9 reports specify the monthly and quarterly usages, but do not specify if there were any deviations of the rolling, 12-month usage restrictions. Please specify in the revised reports if there were any deviations of the rolling, 12-month usage restrictions. If there were deviations, please specify each month during which the deviation occurred along with the rolling, 12-month usage rate for each month during which a deviation occurred.

If you have any questions, please feel free to contact me at 419-936-3938.

From Toledo - an International Award Winning City!



Matthew A. Stanfield
Staff Professional Engineer

cc: Tim Murphy
Karen Granata
John Paulian, OEPA
Lisa Holscher, USEPA Region 5