

# CITY OF TOLEDO



## DEPARTMENT OF PUBLIC UTILITIES

March 13, 2012

### CERTIFIED MAIL

Mr. William Lahner  
Plant Manager  
Crown Cork & Seal  
5201 Enterprise Boulevard  
Toledo, Ohio 43612

Re: Notice of Violation (HPV General Criterion 8)

Dear Mr. Lahner:

Enclosed, please find a "Notice of Violation" for Crown Cork & Seal (Ohio EPA Facility ID 0448010466 Emissions Unit K005). Please review this document carefully as some action is required on your part.

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

Sincerely,

A handwritten signature in cursive script that reads "Matthew A. Stanfield".

Matthew A. Stanfield  
Staff Professional Engineer

### Enclosure

cc: Tim Murphy  
Karen Granata  
Joyce Anagnos  
John Paulian, Ohio EPA  
William Macdowell, U.S. EPA Region 5

## NOTICE OF VIOLATION

March 13, 2012

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

Crown Cork & Seal  
5201 Enterprise Boulevard  
Toledo, Ohio 43612

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

### Dates of Violation(s)

January 25, 2012

### Regulation(s) violated

ORC 3704.05(C) - No person who is the 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.

### Description of Source(s) and Violations(s)

On February 28, 2012, Toledo Division of Environmental Services received a report for stack testing conducted on January 25, 2012 at the North Coater - 36-inch coil coating Line, identified as Ohio EPA emissions unit ID K005. It was reported that the testing resulted in 100% capture efficiency, 95.46% VOC destruction efficiency, and 22.7 pounds per hour VOC emissions while operating at a catalytic incinerator inlet temperature of 650 °F. The Title V permit for K005 requires 100% capture efficiency, 98% VOC destruction efficiency and restricts VOC emissions to 14.02 pounds per hour.

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 Notice of Violation, you shall:

1. Abate the violation(s) or provide for an acceptable remedy.
2. Continue to operate the catalytic incinerator at an inlet temperature of not less than the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance (696 °F).
3. 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). Your written response and any questions regarding this Notice of Violation should be directed to Matthew A. Stanfield at the Division of Environmental Services, 348 South 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.