



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

July 20, 2017

**Certified Mail: 7017066000089092557**

Phillip Baker  
Federal Mogul Corp.  
6420 Glenn Highway  
Cambridge, OH 43725

**Re: Federal Mogul Corp.  
Notice of Violation (NOV)  
Air Permit  
Guernsey County  
0630010003**

**Division of Air Pollution Control**

**Subject: Notice of Violation**

Dear Mr. Baker:

On June 26, 2017, Federal Mogul submitted a complete permit-to-install and operate (PTIO) application for the electric calcining oven with three presses, for the Federal Mogul Corporation facility located in Cambridge, Ohio. It was determined through a review of the application and information received that the third press was added to the calcining oven line in January 2017. Federal Mogul previously considered this process de minimis based on the throughput of two presses, and submitted a PTIO application on May 19, 2017, with a partial revised application submitted on June 26, 2017 (Application A0058635).

A review of the potential-to-emit (PTE) calculations submitted shows the PTE of Press 1 (HV1) and Press 2 (HV2) to be above de minimis levels at 10.03 lbs PM/day and 12.04 lbs PM/day, respectively. Based on that information and that the PTIO application was submitted after the installation of the third press (HV3), Federal Mogul appears to be in violation of Ohio's Division of Air Pollution regulations as detailed below.

**Findings**

Ohio EPA observed the following violations of Ohio's ORC Chapter 3704 and OAC Chapter 3745. In order to bring your facility into compliance, we recommend promptly addressing these violations within 30 days of your receipt of this letter.

1. **ORC 3704.05(A):** *"No person shall cause, permit, or allow emission of air contaminant, in violation of any rule adopted by the director of environmental protection..."*

**ORC 3704.05(G):** *“No person shall violate any order, rule, or determination of the director issued, adopted, or made under this chapter.”*

**OAC rule 3745-31-02(A)(1)(b):** *(1) Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the: ... (b) Installation or modification, and subsequent operation of any new source that is not part of a facility, as defined in Chapter 3745-77 of the Administrative Code, and that is not required to obtain a Title V permit under Chapter 3745-77 of the Administrative Code, without first obtaining a PTIO from the director.”*

- (a) Federal Mogul Corp. installed and subsequently operated one press and a calcining oven, at their facility in Cambridge, Ohio, beginning in January 2016, a second press in September 2016, and a third press in January 2017. In a PTIO application submitted by the facility initially on May 19, 2017, the facility demonstrated that the PTE of the process line containing the calcining oven and three presses were no longer de minimis after the installation of the third press in January 2017.
- (b) During a review of the PTIO application, it was discovered that Federal Mogul Corp. did not obtain a PTIO prior to the installation and operation of the third press.
- (c) Requested action: Within 30 days of receipt of this letter, Federal Mogul Corp. shall submit a compliance plan to Ohio EPA which will address how the facility will address the violations identified above.

## **Conclusion**

The Ohio EPA requests that Federal Mogul Corp. promptly undertake the necessary measures to return to compliance with Ohio’s environmental laws and regulations. Within 30 days of receipt of this letter, please provide, to Ohio EPA, the documentation requested above. If you have already **resolved** the violations listed above thank you, and please provide documentation supporting compliance. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate.

Failure to comply with Chapter 3704. of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Federal Mogul Corporation is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA’s authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

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Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone 740-380-5259 or by email at [Mykal.riffle@epa.ohio.gov](mailto:Mykal.riffle@epa.ohio.gov)

Sincerely,



Mykal L. Riffle  
Environmental Specialist II  
Ohio EPA – Division of Air Pollution Control  
Southeast District Office

MLR/cs

ec: Jessica Kuenzli, DAPC/SEDO  
Ralph Witte, OCAPP/SEDO  
Jim Kavalec, DAPC/CO  
John Paulian, DAPC/CO  
Brian Dickens, U.S. EPA