



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AUG 4 2016

REPLY TO THE ATTENTION OF

David Piedrahita
Forest City Technologies
892 Southrock Drive,
Rockford, Illinois, 61102

Re: Notice of Violation
Forest City Technologies
Rockford, Illinois

Dear Mr. Piedrahita:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Forest City Technologies ("Forest City" or "you") under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). EPA has determined that you are in violation of the Illinois State Implementation Plan at your Rockford, Illinois facility.

Section 113 of the Clean Air Act gives EPA several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

EPA is offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, EPA encourages you to submit to EPA information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Scott Connolly. You may call him at (312) 886-1493 or email at connolly.scott@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



Edward Nam
Acting Director
Air and Radiation Division

Enclosure

cc: Yasmine Keppner-Bauman, Acting Manager, Compliance Section, Bureau of Air

9. Forest City discharged more than 8 pounds per hour of organic material into the atmosphere from one or more of their process units on each of the following dates:

1/16/2013	2/13/2015	8/31/2015
10/10/2013	3/20/2015	9/1/2015
11/22/2013	2/24/2015	9/18/2015
11/26/2013	4/7/2015	10/5/2015
2/12/2014	4/9/2015	10/26/2015
4/7/2014	4/14/2015	11/6/2015
6/3/2014	4/22/2015	1/7/2016
8/13/2014	5/8/2015	2/25/2016
8/22/2014	7/15/2015	4/1/2016
8/26/2014	7/23/2015	
12/19/2014	8/7/2015	

10. Forest City does not employ an oxidizer, vapor recovery system or other air pollution recovery system that reduces by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

Violations

11. By discharging more than 8 pounds per hour of organic material into the atmosphere on 32 separate occasions, Forest City violated Section 215.301 of the Illinois SIP.

Environmental Impact of Violations

12. These violations have caused or can cause excess emissions of xylene and toluene, which are VOCs and classified as hazardous air pollutants that are photochemically reactive substances that can cause serious health problems and cause the formation of ozone.

8/4/16
Date


Edward Nam
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-16-IL-09, by

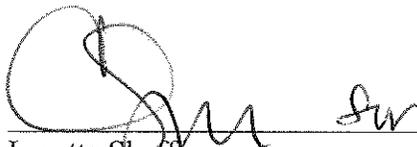
Certified Mail, Return Receipt Requested, to:

David Piedrahita,
Environmental Manager
Forest City Technologies
299 Clay Street
Wellington, Ohio 44090

I also certify that I sent copies of the Notice of Violation by email to:

Yasmine Keppner-Bauman, ,
Acting Manager, Compliance Section
Bureau of Air
Yasmine.Keppner-Bauman@Illinois.gov

On the 8 day of August 2016.



Loretta Shaffer
Program Technician
AECAB, PAS

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