



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

SEP 22 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ron Grannan, Facility Manager
Industrial Container Services – OH, LLC
1385 Blatt Boulevard
Blacklick, Ohio 43004

Re: Finding of Violation
Industrial Container Services – OH, LLC
Blacklick, Ohio

Dear Mr. Grannan:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Industrial Container Services – OH, LLC (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). Based on available information, we find that you are violating the Title V permit that the Ohio Environmental Protection Agency (Ohio EPA) issued to you on July 22, 2014 for your Blacklick, Ohio, facility.

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

We are offering you an opportunity to confer with us about the violations alleged in the FOV. 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, we encourage you to submit to us information responsive to the FOV 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 Charles Hall. You may contact him by telephone at (312) 353 3443 or by e-mail at hall.charles@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: SBREFA fact sheet

cc: Robert Hodanbosi, Chief, Division of Air Pollution Control
Ohio Environmental Protection Agency

Kelly Toth, Manager, Division of Air Pollution Control
Ohio Environmental Protection Agency, Central District Office

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

| | | |
|--|---|-----------------------------|
| IN THE MATTER OF: |) | FINDING OF VIOLATION |
| |) | |
| Industrial Container Services – OH, LLC |) | EPA-5-16-OH-21 |
| Blacklick, Ohio |) | |
| |) | |
| Proceedings Pursuant to the Clean Air Act, |) | |
| <u>42 U.S.C. §§ 7401 et seq.</u> |) | |

FINDING OF VIOLATION

Based on available information and as described below, the U.S. Environmental Protection Agency finds that Industrial Container Services – OH, LLC (hereinafter, ICS) is in violation of Section 502 of the Clean Air Act, 42 U.S.C. § 7661a. Specifically, ICS is in violation of Section C.4.b)(2)a of the Title V Permit issued by the Ohio Environmental Protection Agency on July 22, 2014 as follows:

Statutory and Regulatory Authority

1. Section 502(a) of the Clean Air Act, 42 U.S.C. § 7661a(a) sets forth, in part:

After the effective date of any permit program approved or promulgated under this subchapter, it shall be unlawful for any person to violate any requirement of a permit issued under this subchapter....

2. Pursuant to Section 502(d), 42 U.S.C. § 7661a(d) on August 15, 1995, EPA approved Ohio's Title V operating permit program.
3. On July 22, 2014, the Ohio Environmental Protection Agency (Ohio EPA) issued a Title V operating permit to ICS.
4. On October 22, 2015, the Ohio EPA issued an administrative modification to the Title V permit to change the minimum combustion chamber gas exhaust temperature from 1,800 degrees Fahrenheit (°F) to 1,618°F for ICS's emission unit N002. Ohio EPA did not modify any other terms and conditions of the Title V permit for N002.
5. Title V Permit Section C.4.b)(2)a. and Section C.1.b)(2)a. of the October 22, 2015 administrative modification state:

Best Available Technology (BAT) for this emissions unit includes the use of a permanent total enclosure (PTE) for capturing the OC emissions from the drum handling building and drum furnace with the venting of the captured emissions from the drum handling building and the drum reclamation furnace to add-on organic compound (OC) emission

controls which maintain a minimum destruction and removal (DRE) efficiency of 95 percent by weight. (The current OC emission control consists of a thermal oxidizer[.]

6. The Title V Permit Section C.4.b)(2)c. and Section C.1.b)(2)c. of the October 22, 2015 administrative modification state:

The total enclosure shall meet the design requirements set forth in USEPA guidance document EPA/4-91-010, Method 204 unless otherwise approved in writing by Ohio EPA and USEPA as indicated in the guidance document.

7. Section 6.2 of Method 204, which applies to PTEs, states that "all VOC emissions must be captured and contained for discharge to a control device."

Relevant Background and Alleged Violations

8. ICS owns a drum re-conditioning facility located at 1385 Blatt Boulevard, Blacklick, Ohio.
9. ICS reconditions 55-gallon drums on two process lines: an open head line and a closed head line.
10. On the open head line, ICS removes the drum lid; turns the barrel upside down; puts the lid on top of the overturned drum; sends the barrel through a furnace to remove the paint from all surfaces and any residual contents of the drum and lid; shot blasts the drums and lids; and paints the drums and lids in separate painting booths. The furnace entrance is inside the drum handling building. The furnace exit is on the outside of the drum handling building. ICS controls the emissions from the open head line drum furnace with a thermal oxidizer.
11. During a July 13, 2016, inspection of the facility, EPA observed particulate emissions from the furnace exit on the outside of the building.
12. Based on EPA's observation of uncaptured fugitive emissions from the drum furnace on July 13, 2016, ICS is in violation of Section C.4.b)(2)c. of its Title V Permit and Section C.1.b)(2)c. of the October 22, 2015 administrative modification.

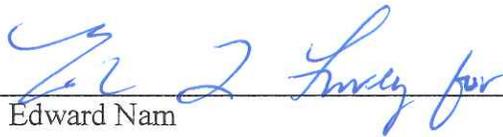
Date

9/22/16

Edward Nam

Acting Director

Air and Radiation Division



CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Finding of Violation, No. EPA-5-16-OH-21, by Certified Mail, Return Receipt Requested, to:

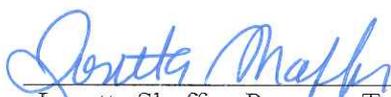
Ron Grannan, Facility Manager
Industrial Container Services – OH, LLC
1385 Blatt Boulevard
Blacklick, Ohio 43004

I also certify that I sent copies of the Finding of Violation by first-class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Kelly Toth, Manager
Division of Air Pollution Control
Ohio Environmental Protection Agency
Central District Office
P.O. Box 1049
Columbus, Ohio 43216-1049

on the 23 day of September 2016



Loretta Shaffer, Program Technician
AECAB, PAS

Certified Mail Receipt Number: 7009 1680 0000 7674 0999