



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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Cleveland, Ohio 44114-1839
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 3114
RETURN RECEIPT REQUESTED**

April 24, 2013

Gerald J. Schill
The Chemical Solvents, Inc.
3751 Jennings Road
Cleveland, OH 44109

**HIGH PRIORITY FACILITY
HIGH PRIORITY VIOLATOR: GENERAL CRITERION 7 AND 9**

FACILITY ID: 13-18-00-7651

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Schill:

On January 24, 2013, the Cleveland Division of Air Quality (CDAQ) inspected The Chemical Solvents, Inc. (Chemical Solvents) located at 1010 Old Denison Avenue in Cleveland.

On February 19, 2013, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Chemical Solvents submit the following records within thirty (30) days of receipt of the letter:

- Demonstrate the modified vapor recovery system for EU J002: Jennings Loading Rack complies with the required 90% control efficiency with the modified refrigeration unit installed in January 2013;
- The amount of material processed for EU P002: LUWA II in tons per hour as a monthly average for February 2012 through January 2013;
- The amount of material processed for EU P002: LUWA II in tons per day as a monthly average for February 2012 through January 2013;
- The amount of material processed for EU P002: LUWA II as a rolling 12-month summation for February 2012 through January 2013;
- The total number of days in operation for EU P002: LUWA II each month for February 2012 through January 2013;
- The rolling, 12-month summation for all raw materials processed in EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013;
- The rolling, 12-month summation of OC emissions in tons for EU P013: High Solids



Solvent Blending Unit for February 2012 through January 2013;

- The monthly average of OC per pound of raw material processed for EU P013: EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013; and
- The average OC emission calculations in pounds per day for EU P013: High Solids Solvent Blending Unit as specified in PTIO #P0094783 Part C.4.d.1.

CDAQ additionally requested the following information:

- The total daily throughputs for EUs J001: Denison loading rack and EU J002: Jennings loading rack for June, September, and October of 2012;
- The operation logs of the vapor recovery units for EUs J001: Denison Loading Rack and EU J002: Jennings Loading Rack with temperatures of the cooling liquid for June of 2012;
- The operations log of the vapor recovery unit for EU P002: LUWA II for the time frame of September 2012 and January 2013; and
- The average temperature logs of the cooling liquid for the vapor recovery system for EU P002: LUWA II for September 2012.

CDAQ is in receipt of the items listed below dated March 25, 2013:

- The amount of material processed for EU P002: LUWA II in tons per hour as a monthly average for January 2012 through December 2012;
- The amount of material processed for EU P002: LUWA II in tons per day as a monthly average for January 2012 through December 2012;
- The amount of material processed for EU P002: LUWA II as a 12- month summation for January 2012 through December 2012;
- The total number of days in operation for EU P002: LUWA II each month for January 2012 through December 2012;
- The rolling, 12-month summation for all raw materials processed in EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013;
- The rolling, 12-month summation of OC emissions in tons for EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013;
- The monthly average of OC per pound of raw material processed for EU P013: EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013; and
- The average OC emission calculations in pounds per day for EU P013: High Solids Solvent Blending Unit as specified in PTIO #P0094783 Part C.4.d.1.
- The total daily throughputs for EUs J001: Denison loading rack and EU J002: Jennings loading rack for June, September, and October of 2012;
- The operations log of the vapor recovery unit for EU P002: LUWA II for the time frame of September 2012 and January 2013; and



- The average temperature logs of the cooling liquid for the vapor recovery system for EU P002: LUWA II for September 2012.

CDAQ then issued a Receipt of Corrective Action Plan (RCAP) letter on April 10, 2013, requesting that Chemical Solvents, Inc. submit a monitoring and maintenance plan for EU J002: Jennings Loading Rack demonstrating that the temperatures of the cooling liquid will be maintained, monitored and recorded at 55° F + 6° F when temperatures are above 55° F by April 23, 2013.

CDAQ is in receipt of an e-mail correspondence on April 22, 2013, which contained a monitoring and maintenance plan for EU J002: Jennings Loading Rack along with a sample log of temperature recordings for the period of March 4, 2013, through April 12, 2013.

The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Megan Murphy at 216-664-4258. All correspondence with CDAQ must include the Ohio EPA facility identification number for Chemical Solvents, Inc.: 13-18-00-7651.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/mm *UK*

cc: Tony Datillo, Enviromatrix Consulting
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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Jennings Vapor Recovery Monitoring & Maintenance Plan

1.0 Process Equipment

DuraChill 7.5 HP Industrial Chiller w/30 gpm Turbine pump.
Tolan 35 Sq. Ft. 316 Stainless Steel Shell and Tube Heat exchanger.

The DuraChill unit displays outlet water solution cooling fluid temperature and alarms in the event of a temperature increase, pump failure or compressors failure.

Dickson Temperature recorder logs both ambient temperature and water solution cooling fluid.

2.0 Daily Maintenance.

Glance at digital chiller readout for temperature reading several times per day. Record temperature reading from Dickson Data Logger once per day.

3.0 Monthly.

Remove Dickson Data logger and download stored data to Graph.
Check Filters and evaporator for frost dirt and free air flow.
Check the condenser for dust accumulation and free air flow.

4.0 Quarterly.

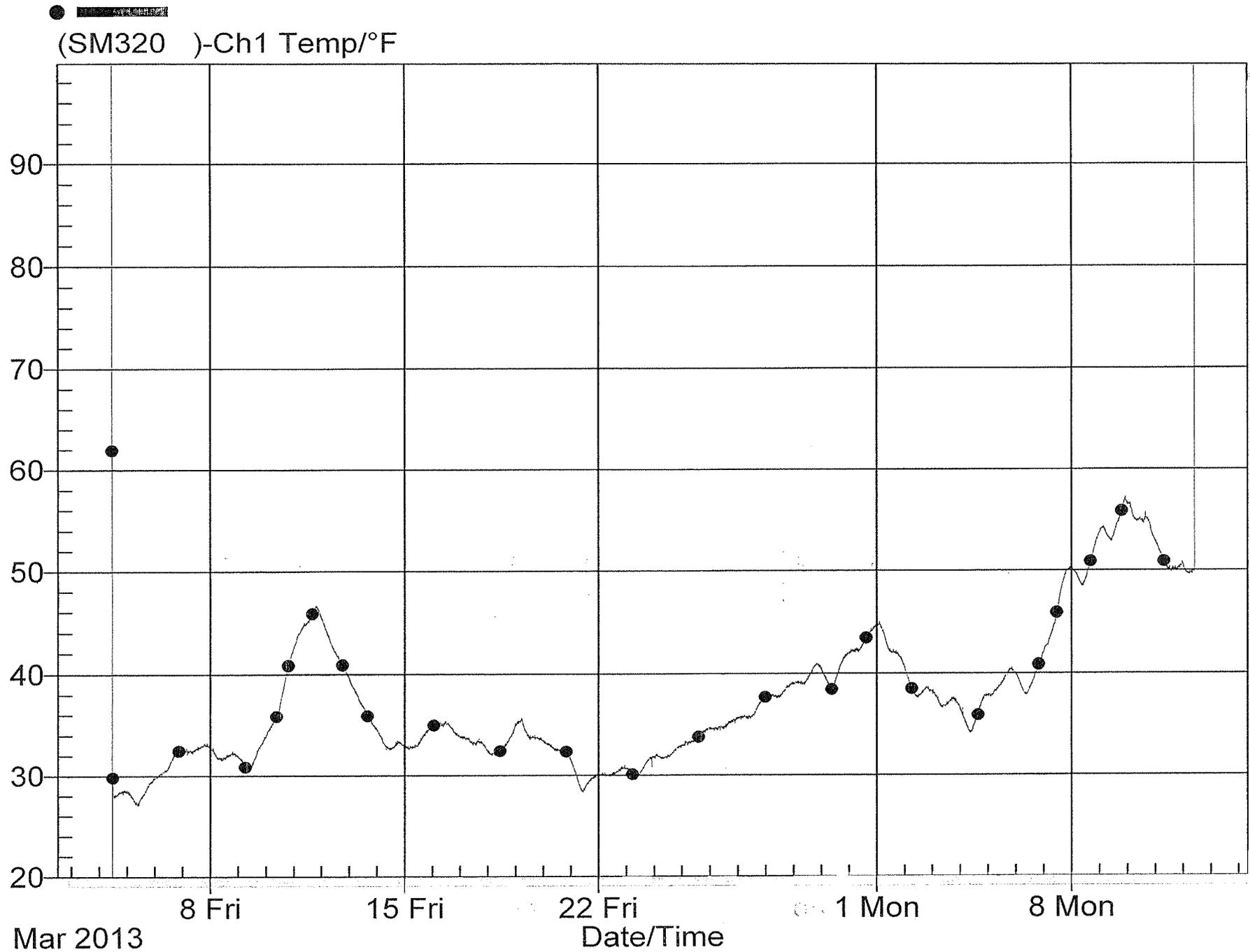
Check outlet carbon canister vent for organic vapors using FID/PID. Record VOC concentration. Replace canister if reading is above 50 ppm. Inspect canister connections to Shell and Tube Heat exchanger.

5.0 Annually.

Have unit inspected by refrigeration contractor. Check all filters and inspect head pressure and suction pressure. Charge compressor as necessary. Service all filters, and check function of the microprocessor controller.

Downloaded Data - Friday, April 12, 2013

Jennings



Murphy, Megan

From: Tony Dattilo <tdatillo@chemicalsolvents.com>
Sent: Monday, April 22, 2013 11:03 AM
To: Murphy, Megan
Cc: rkrajewski@chemicalsolvents.com; jschill@chemicalsolvents.com
Subject: Chemical Solvents Inc.
Attachments: 4-2013 Year to Date Through Put Data.pdf; Jennings VRS 2013.pdf

Dear Ms. Murphy:

Attached is the information requested in CDAQ April 10, 2013 letter to Chemical Solvents Inc. The maintenance plan for the VRS at Jennings is fairly simple as the system is fairly simple. I have also attached the year to date information on materials processed through J001/J002.

Should you have any questions please contact me.

Sincerely

Tony

ANNUAL 2013		Product ID	YTD Total (gal)	lbs OC YTD
Storage Index				
1	N-METHYL 2 PYRROLIDONE		58,776	17.6328
2	SOLVENT 150		39,954	11.9862
3	SOLVENT 100		16,902	5.0706
4	TERT-BUTYL ACETATE		9,045	1.809
5	ODORLESS MINERAL SPIRITS		7,468	2.2398
6	VM & P		16,621	4.9863
7	N-BUTYL ACETATE		29,951	5.9902
8	BUTYL CELLOSOLV (EB)		20,520	6.156
9	METHYL ETHYL KETONE		34,877	105.32854
10	LANTERN FUEL		30,431	91.293
11	ISOBUTYL ACETATE		0	0
12	ISOPROPANOL		39,226	3.9226
13	TOLUOL		37,201	37.201
14	B 100 OIL		53,509	1.60527
15	METHANOL		24,287	48.574
16	HEPTANE		0	0
16	ACETONE (for blends only)		48,483	300.5945
17	PENETRATING CATALYST		119,480	2.3896
18	ACETONE		0	0
18	METHYL ACETATE		32,801	203.3662
19	PENETRATING CATALYST		194,779	389.558
20	XYLENE		49,719	9.9438
21	TECH METHYLENE CHLORIDE		17,597	637.0114
22	TRICHLOROETHYLENE		40,448	161.792
23	PM ACETATE		2,404	0.4808
24	BUTYL CARBITOL		1,680	1.68
25	ISOBUTYL ACETATE		3,530	0.1412
26	METHYL ISOBUTYL KETONE		4,847	4.3623
27	CALLUMET 210-245		3,332	0.09996
			29,779	157.8287
			1,100	9.9
30	N-BUTYL ACETATE - CFF SPEC		0	0
			0	0
33	N-BUTYL ALCOHOL		46,238	46.238
34	CYCLOHEXANONE HONEYWELL		22,195	4.439
35	ACETONE		185,944	1022.692
36	ISOPROPANOL		71,410	46.4165
37	TETRAHYDROFURAN		5,998	17.994
38	LVP 200 CALLUMET		120,930	3.6279
39	LVP 100 CALLUMET		80,284	2.58852
40	CALLUMET solvent 142 < 1%		22,096	0.66288
41	ACETONE		50,104	275.572
42	ISOPROPANOL		52691	34.24915
43	CALLUMET SOLVENT 142 < 1%		100795	3.02388
44	MINERAL SPIRITS		78810	2.3543
	TOTALS		968,745	2222.94387

KEROSENE

2013 YTD Denison

Storage Index	Product ID	Description	YTD Total	January	February	March	April	May	June	July	August	September	October	November	December	YTD Total	Uncontrolled lbs OC YTD
P3	RCEATR 79		4,734	1,682	807	2,265										4,734	18.3
P4	TRACEI		10,644	2,507	3,960	1,964	2,213									10,644	104.73696
P5		Ethyl Acetate	12,625	2,900	6,085		3,640									12,625	81.68375
P6	RC XY		4,588			4,588										4,588	2.61516
P7	MAGIE-55 LX																0
P8	C438GR		4,991	2,308	1,642	1,041										4,991	130.01555
P9	4380R		10,787	3,116	1,296	1,775	4,600									10,787	27.72259
P9	RCEA																0
P9	MCB95																0
P9	MEK		12,726	6,340		6,386										12,726	32.70582
P10	TAAAF		6,681	1,516	2,274	1,229	1,662									6,681	20.51067
P11	MASK WASH																0
P12	MASK WASH	Mask Wash	14,356	3,520	3,520	4,580	2,736									14,356	34.74152
P13	EA-OFF SPEC																0
P14	RM39	Hexane	13,917	7,026		6,891										13,917	79.60524
P15	535HT-VIRGIN		7,003	635	6,160											7,003	0.21009
P16	RM97	Solvent 142	49,139	15,881	12,515	7,243	13,500									49,139	0.99278
P17	KEROSENE		30,110	14,312	8,465		7,343									30,110	1.50550
P18	TC175		5,721		5,721											5,721	43.25076
P19	TRM184		7,263		3,213	1,026	3,024									7,263	0.14526
P20	RCTRI																0
P24	RC-MW		5,645	5,490			155									5,645	20.8865
P25	Acetone		138,351	41,786	27,828	25,599	43,138									138,351	469.00989
P26	RCPERC	Rec Perchloroethylene															0
P27	PERC	Perchloroethylene	7,587	5,427	2,160											7,587	5.98614
P28	RM319	N-Pentane	30,710	15,673	7,195		7,842									30,710	466.7920
P29	RM61	Mineral Spirits	18,215	3,074	10,011	5,130										18,215	0.36430
W101	WH20		6,584				6,584									6,584	0.13168
W102	WFLTA		14,266	4,540	3,885	3,060	2,781									14,266	62.19976
W103	WMW		25,577	13,674	6,920		5,383									25,577	56.52517
W104	WXY		13,875	3,615	2,630	4,945	2,685									13,875	3.05250
W105	WXY		6,703	5,236			1,467									6,703	1.47466
W106	REUSE		14,539	2,050	5,545	5,709	1,235									14,539	3.19858
W107	WPT	Spent Paint Related Material	5,745		4,535	1,210										5,745	41.9385
W107	WCS4380		6,460	2,565		1,750	2,145									6,460	47.1580
W108	WFL T/A	Waste Flammable Liquid Turnaround	22,490	4,965	5,595	3,605	8,325									22,490	159.6790
W108	WH20																0
W108	WPT																0
W109	WFL TA		10,402	2,846	2,831	4,725										10,402	31.206
F1	WFL	Spent Flammable Liquid	51,655	16,379	11,474	15,120	8,682									51,655	33.57575
F2	WFL	Spent Flammable Liquid	346		346											346	0.22490
F21	WFL	Spent Flammable Liquid															0
F22	WFL	Spent Flammable Liquid	6,731	4,056		2,635										6,731	4.37515
F23	WFL	Spent Flammable Liquid	348,985	87,311	79,224	96,915	85,535									348,985	1,240
Product Sub-Total			280,650	225,435	209,391	214,675										930,151	
Waste Sub-Total			395,793	133,373	102,850	69,717	89,853									395,793	1,542
Fuel Sub-Total			126,641	39,491	31,541	25,004	30,605									126,641	407
Totals			407,717	107,786	91,044	114,670	94,217									407,717	1,278
Check Sum			930,151	280,650	225,435	209,391	214,675									930,151	3,226