



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 4838
RETURN RECEIPT REQUESTED**

5/29/13

Robert Hatala
Hatala Refinishing
1200 E. 55th St.
Cleveland, OH 44103

FACILITY ID: 13-18-00-8052

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

Dear Mr. Hatala:

On 3/26/13, the Cleveland Division of Air Quality (CDAQ) inspected Hatala Refinishing (Hatala) located at 1200 E. 55th St. in Cleveland.

On 4/5/13, CDAQ issued a Notice of Violation (NOV) citing that recordkeeping, training and inspections for emissions unit (EU) K001: 45' x 21' x 15' 10" Ameri-Cure down draft paint spray booth with fiberglass mat filters had not been maintained in the Permit to Install/Operate (PTIO) specified format. And, that the Permit Evaluation Reports (PERs) that have been submitted are not correct.

The NOV required that Hatala resubmit the PERs for 2010, 2011 and 2012 indicating non-compliance with operational restrictions, monitoring and recordkeeping requirements.

Additionally, CDAQ requested that Hatala submit the following information specified in PTIO renewal #: P0094885 Part C, (1)(b) through (f):

- MSDSs that substantiate coating usage in compliance with the Volatile Organic Compound (VOC) limitations established in PTIO #: P00094885 Part C, (1)(b)(2)(a).
- Documentation of proper training in the use of a HVLP sprayer for all employees applying coatings and any solvents used to clean the sprayer as required in PTIO #: P00094885 Part C, (1)(e)(2).
- A two week sample of material usage recordkeeping that tracks coating information as specified in PTIO #: P00094885 Part C, (1)(d)(1)(a),(b) and (c).



- A copy of the manufacturer's recommendations specific to inspections of the dry particulate filter as required by PTIO #: P00094885 Part C, (1)(d)(3)and(4).
- A sample recordkeeping form that will track all the required inspection documentation for the dry particulate filter as specified in the PTIO #: P00094885 Part C, (1)(d)(6)(a), (b), (c) and (d).

On 5/2/13, you met with CDAQ personnel to review proposed recordkeeping templates and also provided the following information:

- MSDSs that substantiated coating usage in compliance with VOC limitations established in PTIO #: P00094885 Part C, (1)(b)(2)(a).
- Documentation of proper training in the use of a HVLP sprayer for all employees applying coatings and any solvents used to clean the sprayer as required in PTIO #: P00094885 Part C, (1)(e)(2).
- A sample template for material usage recordkeeping that tracks coating information as specified in PTIO #: P00094885 Part C, (1)(d)(1)(a),(b) and (c).
- Manufacturer's specifications for the filters used in EU K001.

During the meeting guidance was provided by CDAQ on language to be included with the resubmitted PERs, and additional steps required for addressing the sample recordkeeping form that will track all the required inspection documentation for the dry particulate filter.

On 5/13/13 CDAQ received the following documentation:

- PERs for 2010, 2011 and 2012 indicating non-compliance with operational restrictions, monitoring and recordkeeping requirements.
- A two week sample of material usage recordkeeping that tracks coating information as specified in PTIO #: P00094885 Part C, (1)(d)(1)(a),(b) and (c).

And, on 5/22/13, CDAQ was provided a sample recordkeeping form that will track all the required inspection documentation for the dry particulate filter as specified in the PTIO #: P00094885 Part C, (1)(d)(6)(a), (b), (c) and (d).

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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Hatala Refinishing: 13-18-00-8052.

Sincerely,

A handwritten signature in black ink that reads "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/dd **UK**

cc: John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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