



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 4852
RETURN RECEIPT REQUESTED**

6/6/13

Thor H. Egeland
Ferrotherm Corporation
4758 Warner Rd.
Cleveland, OH 44125

FACILITY ID: 13-18-22-0374

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

Dear Mr. Egeland:

On 3/12/13, the Cleveland Division of Air Quality (CDAQ) inspected Ferrotherm Corporation (Ferrotherm) located at 4758 Warner Rd. in Cleveland. On 3/21/13, CDAQ issued a formal Information Request letter to establish records accurately reflecting the status of emissions units (EUs) currently in operation at Ferrotherm.

The Information Request letter specifically addressed:

- EU B001: Natural-gas fired Dravo-Model 150 L-SGA 1.9 mmBtu/hr boiler that was determined to no longer be located at your facility
- Alloy paint spray booth (bench top with hood), coatings applied from commercially available products in spray cans
- Fifteen (15) cutting/grinding/finishing stations for new parts with manifold vent to two (2) Torit cartridge style dust collectors
- Approximately twelve (12) cutting/grinding/finishing stations for rebuilt/repaired parts with manifold vent to two (2) cyclone style dust collectors
- Electro Discharge Machining (EDM), EDMS 300/10, Columbia ZNC (Uncontrolled)

CDAQ requested that Ferrotherm:

- Submit a signed withdrawal form for EU B001 including an effective date of termination or removal
- Submit records as specified in the OAC Rule 3745-15-05 (A)(E) to establish a "DeMinimis" air contaminant source exemption for the EU installations observed by CDAQ personnel noted above



On 4/5/13, CDAQ received a response from Ferrotherm that included:

- A signed Withdrawal Form for EU B001: Natural-gas fired Dravo-Model 150 L-SGA 1.9 mmBtu/hr boiler
- 2012 Purchase records for the Alloy paint booth (Krylon-Crystal Clear), 2012 Purchase records for the Electro Discharge Machines (Evolution Oil), the material safety data sheets (MSDSs) for Krylon-Crystal Clear, Evolution Ultra and Evolution Premium that satisfied the requirements for “DeMinimis” air contaminant source exemptions
- A narrative regarding the difficulty of determining the emissions associated with the cutting/grinding/finishing stations

On 4/16/13, CDAQ issued a Notice of Violation for installation and operation of EUs without first obtaining Permits to Install/Operate (PTIOs). CDAQ requested that Ferrotherm submit PTIO applications and the respective emissions activity category (EAC) forms for the all EUs associated with the cutting/grinding/finishing stations in both the repair area and finishing area for new parts.

On 5/9/13, CDAQ received an electronic version of a formal compliance deadline extension request (hard copy mailed). The request confirmed Ferrotherm’s arrangements to meet with a representative of the Ohio Environmental Protection Agency’s Office of Compliance Assistance and Pollution Prevention (Ohio EPA, OCAPP) on 5/15/13.

On 5/10/13, CDAQ issued a Receipt of Corrective Action Plan (RCAP) letter. The RCAP letter acknowledged the correspondence with CDAQ that requested a new compliance deadline for submission of the PTIO applications and EAC forms based on assistance provided through OCAPP. The RCAP letter confirmed 6/14/13 as the new compliance deadline for submitting the PTIO applications and EAC forms.

On 6/4/13, CDAQ received a PTIO application packet for the Deburr Room and Bader Area at Ferrotherm. CDAQ compliance personnel reviewed the application packet and determined that the EUs did not require State Permits at this time.

On 6/6/13, CDAQ compliance representative, Sarah Buzas issued a letter to Ferrotherm. The letter confirmed the EUs did not require State Permits in accordance with Ohio Administrative Code (OAC) Rule 3745-15-05. Additionally, the letter stated that although the “DeMinimis” rule exempts the EUs from permitting, the owner or operator must maintain records as described under paragraph (E) of the rule.

The corrective action plan was received 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 Ferrotherm Corporation: 13-18-22-0374.

Sincerely,

A handwritten signature in black ink, appearing to read "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/ddLK

cc: Sarah Buzas, CDAQ
Adrienne LaFavre, OCAPP
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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SERVING OHIO EPA AS

AGENCY 13 FOR CUYAHOGA COUNTY

June 6, 2013

Mr. Thor Egeland
Ferrotherm Corporation
4758 Warner Road
Garfield Heights, Ohio 44125

Facility ID: 13-18-22-0374
Emissions Unit(s): P001 and P002

Dear Mr. Egeland:

The Cleveland Division of Air Quality (CDAQ) has received an application for a State Permit-to-Install and Operate (PTIO) for the Ferrotherm Corporation located at 4758 Warner Road in Garfield Heights, Ohio. After review, we have determined that the emission unit(s) listed above does not require State Permits at this time in accordance with Ohio Administrative Code (OAC) Rule 3745-15-05. Please be aware that although this "de minimis" rule exempts the emissions unit from permitting, the owner or operator must maintain records as described under paragraph (E) of this rule.

Please feel free to contact me by phone (216) 420-7681 or email Sbuzas@city.cleveland.oh.us with further questions regarding your air permitting requirements.

Sincerely,

A handwritten signature in black ink that reads "Sarah C. Buzas".

Sarah C. Buzas

Environmental Compliance Specialist II
Cleveland Division of Air Quality

Enclosure

cc: Facility file



May 31, 2013

Cleveland Division of Air Quality
Permitting Section
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839

* Copy — original sent
back to the facility with
the De minimis letter.

Subject: Ohio E.P.A. FACILITY ID: 13-18-22-0374

EUs added to stars 2
profile and are denoted to
reflect De minimis status.

Attention Mr. David Hearne

Dear Hearne,

Enclosed please find a Permit-to-Install and Operate (PTIO) application packet for the Deburr Room and Bader Area at Ferrotherm Corporation located at 4758 Warner Road, Cleveland, Ohio 44125. These application forms are being submitted in response to the Notice of Violation letter dated May 10, 2013, sent to Ferrotherm by your office.

Please note, Ferrotherm believes that both areas meet the *de minimis* exemption found in Ohio Administrative Code 3745-15-05. Please review the information in Attachment One which is enclosed with this letter.

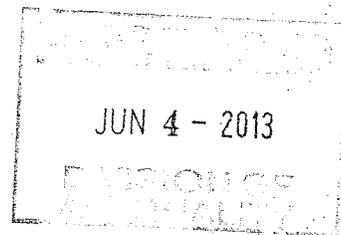
Please let me know if you need any additional information from Ferrotherm.

Sincerely,

A handwritten signature in black ink, appearing to read 'TH. Egeland', written over a horizontal line.

Thor H. Egeland
President
Ferrotherm Corporation

ATTACHMENT ONE
DESCRIPTION AND CALCULATIONS for
Ferrotherm Corporation
4758 Warner, Cleveland, OH 44125



General Description

Ferrotherm Corporation (Ferrotherm) manufactures seals and shrouds for both commercial and defense aircraft customers. The primary activities include cutting, milling, trimming, drilling, heat treatment, blasting, and grinding. There is no plating. Painting is limited to a bench top with a hood and using aerosol cans of coatings.

There are two major areas where fugitive dusts are generated: the Bader Area and the Debur Room.

Description and Calculations for Emission Areas

Bader Area

The Bader Area is equipped with twelve (12) cutting/grinding/finishing stations. This area is used in the process of rebuilding and repairing parts. Rebuilding/repair is becoming a less and less important part of Ferrotherm's business. The only activity in this area is now the use of a belt sander. Essentially, the entire department is gone.

Processing of used parts involves removing a honey comb type structure from the parts. This is done using a belt driven sander. The honeycomb material measures 1" wide, 6" long, and 1/8" high with a thickness of 2/1000". It is made of Hastelloy and the waste metal is recycled. Hastelloy has a weight of 0.297 lb/in³ (based on information from a 1997 Haynes International, Inc. publication).

The Bader area is used on the average about 4 hr/day. A maximum usage would be 8 hr/day and processing 40 parts/day.

There is a manifold vent to two (2) cyclone style dust collectors which empty into 55 gallon drum. The drum is emptied once per year. It is about 3/4 full when emptied.

Emissions have been estimated two different ways.

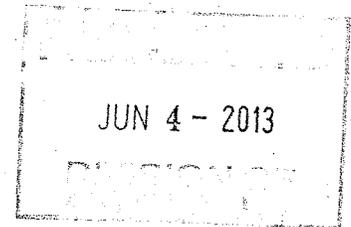
- a. The 1"x6"x1/8" area is equal to 0.75 in³. If this were a solid piece of Hastelloy, it would weigh 0.223 lb. Processing a maximum of 40 parts/day would lead to 8.91 lb of metal removed. Discounting the cyclones, this level represents a *de minimis* amount. Because the area is serviced by air pollution control equipment and the material is not solid, the emissions are significantly less.

- b. Ferrotherm has measured the honeycomb which is actually removed from one of its products. The honeycomb weight example used is for part EN 5911 shroud. The weight of the honeycomb to be stripped off this part is approximately 0.032 lb/part. This part is typical of the parts undergoing repair. The maximum total amount of this material removed in one day would be 1.28 lb/day. Discounting the cyclones, this level represents a *de minimis* amount. Because the area is serviced by air pollution control equipment the emissions are significantly less.

Debur Room

The Debur Room contains approximately fifteen (15) cutting/grinding/finishing stations used for to remove small burrs from new parts. There is a manifold vent to two Torit cartridge style dust collectors. There are trays under the filters. The fine materials are caught in the filters. Three time per year the trays are cleaned. A maximum of two (3) pounds of material is collected from the trays. This metal waste is recycled. The room is used each day and for all shifts. In other words, the Debur Room is used 24 hr/day.

To estimate the emissions, it is assumed that ten (10) lb waste is collected in one year. This would represent 0.03 lb/day for a 345 day work year. The Debur Room is clearly a *de minimis* source of air contaminants.





Application for Permit to Install (PTI) and Permit to Install/Operate (PTIO)

Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Application Number _____

Facility Information

Note: Application is incomplete if all **bolded** questions throughout the application are not completed.

Legal Facility Name Ferrotherm Corporation

Alternate Name (if any) _____

Facility Physical Address 4758 Warner Road

City, ZIP code Garfield Hts., Ohio 44125

County Cuyahoga

Facility ID 13 18 22 0374

Facility Description Aircraft Engine Components

NAICS Code 333414

Facility Latitude 41 degrees 25 minutes 49.402 seconds

Facility Longitude -81 degrees 38 minutes 3.316 seconds

Core Place ID (if known) 9746

SCSC ID (if known) 3903501638

Portable? Yes x No

Portable Type Asphalt Plant Concrete Plant Generator Aggregate Processing Concrete Crusher Grinder Other

Initial Location County _____ If "Other", describe: _____

