



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 7011 3500 0000 1759 8591  
RETURN RECEIPT REQUESTED**

May 31, 2013

Gerald Hall  
Hall Brothers Inc.  
27040 Cook Road  
Olmsted Township, OH 44138

**NON-HIGH PRIORITY FACILITY**

**FACILITY ID: 13-18-42-8388**

**LETTER OF WARNING: Incomplete Reporting, Monitoring and Recordkeeping.**

Dear Mr. Hall:

On May 14, 2013, the Cleveland Division of Air Quality (CDAQ) inspected Hall Brothers Inc. located at 27040 Cook Road in Olmsted Township. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

During the inspection, CDAQ discovered incomplete records pertaining to emission unit (EU) N001: Incinerator. The Permit-To-Install/Operate (PTIO) for EU N001 requires on-going tracking and written record of temperatures reached during incineration, the duration of each combustion period, the total approximate amounts and type of materials being charged each time, and daily logs of each time EU N001 is in operation. The PTIO also requires checks for visible emissions from the stack to be performed and documented when EU N001 is in operation. These violations in recordkeeping have been occurring since December 21, 2010, the date of PTIO issuance.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Hall Brothers Inc. submit a corrective action plan outlining how the above deficiencies will be corrected in the immediate future, to the following enforcement representative:

Roman Fedorko  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

CDAQ also requests that Hall Brothers Inc. submit the following records for EU N001 for June 2013 operations by July 15, 2013:

- Written record of temperatures and duration of combustion each time EU N001



is in operation.

- Amounts and type of material charged each time.
- Log of daily operations of the EU N001, including time and date the ash is removed.
- When the weather conditions allow, perform checks for any visible emissions from the stack during operation of EU N001.

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars (\$25,000) or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation 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 Roman Fedorko at 216-664-4794. All correspondence with CDAQ must include the Ohio EPA facility identification number for Hall Brothers Inc.: 13-18-42-8388.

Sincerely,

Valencia White

Chief of Enforcement, CDAQ

VW/RF

cc: Gerald Hall, Hall Brothers Inc.  
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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