



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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 3169
RETURN RECEIPT REQUESTED**

June 20, 2013

Brian Kucia
Vice President
SRC Worldwide
3425 Service Rd.
Cleveland, OH 44111

HIGH PRIORITY VIOLATOR – GENERAL HPV CRITERION 7

FACILITY ID: 13-18-00-1732

NOTICE OF VIOLATION: Failure to report a malfunction

Dear Mr. Kucia:

On June 11, 2013, the Cleveland Division of Air Quality (CDAQ) inspected SRC Worldwide located at 3425 Service Road in Cleveland, in response to a complaint received on June 11, 2013, at 7:48 a.m. reported by the Cleveland Fire Department. This letter serves as notification that you are operating a source in violation of the following applicable air statutes, air regulations, or air permit conditions.

SRC Worldwide failed to immediately report a malfunction of air pollution control equipment associated with emissions unit (EU) P004: Flux Fusion Operation/Electric furnace controlled by: Cyclone-dry, a SLY Venturi Wet Scrubber Packed Tower Wet Scrubber, and a demister pad. This is a violation of Ohio Administrative Code (OAC) Rule 3745-15-06(B)(1) and permit-to-install/operate (PTIO): #P0094375 Section (A)(10).

CDAQ was informed at the time of the inspection that an electrical transformer had been compromised and was no longer operating in order to maintain conduction for the furnace. CDAQ had requested at the time of the site visit, that the malfunction be reported and SRC was provided with the necessary contact information to do so. A malfunction has yet to be reported to CDAQ via the Air Quality Malfunction Hotline.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that SRC Worldwide submit a malfunction report for this and all future incidents immediately upon discovery through the CDAQ Air Quality Malfunction Hotline (216) 664-7442 within ten (10) days of receipt of this letter.

If there is insufficient time to correct the alleged violations, a written response which includes a timeline for correcting the alleged violations, must be received within ten (10) days of receipt of this letter.



Additionally, CDAQ requests that SRC Worldwide complete the following within thirty (30) days of receipt of this letter:

- Submit a written explanation of the cause of the malfunction of the air pollution control equipment which includes an estimate of the emissions which bypassed the wet scrubbers during the malfunction
- Complete the necessary repairs to EU P004 and contact CDAQ once the repairs have been completed and the unit is able to properly operate

Submit the information requested above to the following enforcement representative:

Megan Murphy
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, OH 44114

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) per day or imprisonment for not more than one year, or both, for each violation.

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 Megan Murphy at 216-664-4258. All correspondence with CDAQ must include the Ohio EPA facility identification number for SRC Worldwide: 13-18-00-1732.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/mm

cc: 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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