



**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 #70122210000052090526  
RETURN RECEIPT REQUESTED**

July 9, 2013

Bok Kang  
Royal Dry Cleaners  
865 East 152<sup>nd</sup> Street  
Cleveland, OH 44110

**NON-HPV**

**FACILITY ID: Unassigned**

**NOTICE OF VIOLATION: Operating without a permit, failure to perform and maintain required recordkeeping and failure to use a halogenated hydrocarbon detector**

Dear Mr. Kang:

On June 27, 2013, the Cleveland Division of Air Quality (CDAQ) inspected Royal Dry Cleaners located at 865 East 152<sup>nd</sup> Street in Cleveland. 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.

Royal Dry Cleaners has been operating Emission Unit Bowe Passat Permac P546 Dry-To-Dry Dry Cleaning Machine without a permit since at least 2007. This is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1) and Ohio Revised Code (ORC) Section 3704.05(F).

Royal Dry Cleaners has also failed to perform the following required recordkeeping items:

Maintain records of 5 years of PERC purchases, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d);

Perform and record bi-weekly perceptible leak checks, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.322(k) and OAC Rule 3745-21-09(AA)(3) and (4)(b);

Conduct a monthly leak check using a halogenated hydrocarbon detector or PCE gas analyzer, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.322(k) and 63.322(o)(1)(i);

Record the monthly PERC usage, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d)(1);



Record the rolling 12-month total PERC usage, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d)(2);

Measure and record weekly the exhaust temperature on the outlet of the refrigerated condenser which is a violation of Title 40 CFR Part 63 Subpart M Section 63.323(a)(1).

Royal Cleaners has also failed to purchase and perform monthly leak checks with a halogenated hydrocarbon detector or PCE gas analyzer. This is a violation of Title 40 CFR Part 63 Subpart M Section 63.322(o).

In addition, Royal Cleaners has failed to submit a National Emission Standards for Hazardous Air Pollutants (NESHAP) Notification of Compliance Status Form. This is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(a)

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Royal Dry Cleaners submit:

- a Permit-to-Install/Operate (PTIO) application and
- the NESHAP Notification of Compliance Status Form,

to the following address within 30 days of receipt of this letter:

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

Also, CDAQ requests that Royal Dry Cleaners;

- purchase a halogenated hydrocarbon detector or PCE gas analyzer and submit a copy of the invoice;
- submit a two week sample of record keeping
- submit a plan of corrective action outlining the steps that will be taken to ensure that all required record keeping is performed correctly in the future,

to the following enforcement representative within thirty (30) days of receipt of this letter:

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

Your written response to this letter must be received by CDAQ within thirty (30) 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.



Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

PTIO applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned. PTIO applications can also be downloaded at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.aspx>

The NESHAP Notification of Compliance Status Form has been included in this letter and can also be found at [http://epa.ohio.gov/ocapp/dry\\_cleaning.aspx](http://epa.ohio.gov/ocapp/dry_cleaning.aspx).

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the facility name: Royal Dry Cleaners.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/ak LK

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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Enclosed: NESHAP Notification of Compliance Status Form  
Korean Instruction Forms