



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 8706  
RETURN RECEIPT REQUESTED**

September 4, 2013

Michael Skladany  
Ritrama Inc.  
341 Eddy Road  
Cleveland, OH 44108

**HIGH PRIORITY FACILITY  
HPV GC7**

**FACILITY ID: 13-18-00-7355**

**NOTICE OF VIOLATION: Failure to submit a Permit-to-Install/Operate (PTIO) application for the operation of your compounding room, and late submittal of quarterly deviation reports for coating and adhesive lines.**

Dear Mr. Skladany:

On July 16 and July 24, 2013, the Cleveland Division of Air Quality (CDAQ) inspected Ritrama Inc. located at 341 Eddy Road in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Ritrama Inc. has failed to submit a Permit to Install/Operate (PTIO) application for Emission Unit (EU) P001 – Compounding Storage Room with Five Mixers for Adhesives and Vinyl Mixtures and Two Cold Cleaners vented to the Regenerative Thermal Oxidizer. Ritrama Inc. has operated EU P001 in violation of Ohio Administrative Code (OAC) rule 3745-31-02(A)(1) by failing to apply or obtain an installation or operating permit since January 1, 1988. This is also a violation of Ohio Revised Code (ORC) section 3704.05.

Additionally, Ritrama Inc. has failed to comply with the reporting requirements as required by the issued permits for EUs K003: Adhesive Coating Line, and K004: Vinyl Cast Coating Line, by not submitting timely quarterly deviation reports for calendar year 2012 and first quarter of 2013. The quarterly deviation reports were required to be submitted by April 30, July 31, October 31, and January 31, covering the records for the previous quarters. This is a violation of permit-to-install No. 13-4075, permit-to-install No. 13-4262, permit-to-operate No. P0094706, and ORC sections 3704.05(C) and (D).



On June 28, 2013, Ritrama Inc. submitted a quarterly deviation report covering the quarters extending from January 2012 to March 2013. Please note that Ritrama Inc. is expected to submit future reports as required.

Furthermore, CDAQ requests that Ritrama Inc. submit a PTIO application for EU P001 through Ohio EPA's eBusiness Center ("Air Services"), found at <http://www.epa.ohio.gov/dapc/airservices.aspx>, within thirty (30) days of your receipt of this letter.

A PTIO application form with instructions can be found on Ohio EPA's Website at: <http://www.epa.ohio.gov/dapc/permits/permits.aspx>.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in ORC 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.

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 Ritrama Inc.: 13-18-00-7355.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/rf

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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