

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR, SHRI DAVE  
LAKESHORE GAS  
21820 LAKESHORE BLVD.  
EUCLID, OH 44123

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature  Agent  
 Addressee
- B. Received by (Printed Name) C. Date of Delivery
- Shri Dave 22 Sep
- D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type
- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number  
(Transfer from service label)

7006 2760 0000 3705 2760



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
1925 St. Clair Avenue  
Cleveland, Ohio 44114-2080  
216/664-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

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

**CERTIFIED MAIL 7006 2760 0000 3705 2760  
RETURN RECEIPT REQUESTED**

September 14, 2007

Mr. Shri Dave  
Lakeshore Gas  
21820 Lakeshore Blvd.  
Euclid, OH 44123

**FACILITY ID: 13-18-20-7277  
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Dave:

On July 30, 2007, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation to Lakeshore Gas for failure to conduct a Dynamic Pressure test, an Air-to-Liquid Ratio test, a Static Leak test and failure to provide the most recent Stage II test results. CDAQ is in receipt of the required test results on September 13, 2007, for tests completed on August 22 and 27, 2007.

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 Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Lakeshore Gas: 1318207277.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker  
Chief of Enforcement, CDAQ

GB/LK

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Facility File and L:\Data\Facilities\1318207277\2007 NEAR.doc



North Royalton, Ohio 44133

Phone: (440)237-9200

Fax: (440)582-5119

**LOCATION DATA: STAGE II VAPOR RECOVERY SYSTEM TEST DATA FORM**

Location Name: <u>LAKESHORE GAS USA</u>	Location #: <u>N/A</u>	Job #: <u>9474</u>	Date: <u>8/22/2007</u>
Address: <u>21820 LAKESHORE</u>		Tester: <u>JOE WILLIAMS</u>	
City/State: <u>EUCLID OH 44123</u>	Inspector: <u>MIKE SAMEC</u>		

Stage I Type:	Two Point: <input checked="" type="checkbox"/>	Coaxial: <input type="checkbox"/>	Poppeted?: <input type="checkbox"/>	Manifolded: UG <input checked="" type="checkbox"/>	AG <input type="checkbox"/>	<u>0</u> Feet AG
Stage II Type:	Vapor Balance: <input type="checkbox"/>	Vacuum Assist: <input checked="" type="checkbox"/>	Type: <u>TV</u>			
	Drop Out: <input checked="" type="checkbox"/>	Sealed: <input checked="" type="checkbox"/>	Syphon: <input checked="" type="checkbox"/>			

**STATIC LEAK TEST RESULTS:**

Product Type:	RUL	PUL			TOTALS
Actual Tank Capacity (Gallons):	<u>12,090</u>	<u>6,078</u>	<u>0</u>	<u>0</u>	<u>18,168</u>
Gasoline Volume (Gallons):	<u>2,416</u>	<u>1,022</u>	<u>0</u>	<u>0</u>	<u>3,438</u>
Ullage (Gallons):	<u>9,674</u>	<u>5,056</u>	<u>0</u>	<u>0</u>	<u>14,730</u>
Initial Pressure of UST:	Inches Water				<u>.75</u>
Nozzle Served by Tank (s):	Quantity				<u>4</u>
(A) Stage I Coupler / (B) Stage II Riser:	Test Location				<u>A</u>
Initial Pressure:	Inches Water				<u>2.00</u>
Pressure After 1 Minute:	Inches Water				<u>2.00</u>
Pressure After 2 Minutes:	Inches Water				<u>2.00</u>
Pressure After 3 Minutes:	Inches Water				<u>2.00</u>
Pressure After 4 Minutes:	Inches Water				<u>2.00</u>
Pressure After 5 Minutes:	Inches Water				<u>2.00</u>
Allowable Final Pressure:	Table IA or IB				<u>1.93</u>
Test Status:	Pass or Fail				<u>PASS</u>

**DYNAMIC PRESSURE TEST RESULTS:**

Riser / Nozzle #	40 CFH .16 Max	60 CFH .35 Max	80 CFH .62 Max	Pass / Fail	Riser / Nozzle #	40 CFH .16 Max	60 CFH .35 Max	80 CFH .62 Max	Pass / Fail
<u>1</u>	<u>.08</u>	<u>.15</u>	<u>.24</u>	<u>PASS</u>					
<u>2</u>	<u>.08</u>	<u>.12</u>	<u>.22</u>	<u>PASS</u>					
<u>3</u>	<u>.08</u>	<u>.14</u>	<u>.24</u>	<u>PASS</u>					
<u>4</u>	<u>.06</u>	<u>.15</u>	<u>.23</u>	<u>PASS</u>					

Gallons of gasoline introduced into Stage II riser. 8 Did gauge pulsate or peg at any flow rate during test? NO/PASS

**COMMENTS:**



North Royalton, Ohio 44133  
 Phone: (440)237-9200  
 Fax: (440)582-5119

**AIR TO LIQUID RATIO (A/L) TEST DATA FORM**

**LOCATION DATA:**

Location Name:	LAKESHORE GAS USA	Location #:	N/A	Job #:	8474	Date:	8/22/2007
Address:	21820 LAKESHORE			Tester:	JOE WILLIAMS		
City/State:	EUCLID	OH	44123	Inspector:	MIKE SAMEC		

Stage II System Type: Vacuum Assist:  Manufacturer: TV Hasstech:

**RESULTS:**

Disp#	Nozzle Model#	Gas Grade	Gas		A/L Ratio	Pass / Fail	Disp#	Nozzle Model#	Gas Grade	Gas		A/L Ratio	Pass / Fail
			Loaded Gal	Dispensing Rate-GPM						Loaded Gal	Dispensing Rate-GPM		
1	ICVN	RUL	2.533	8.27	.94	PASS							
1	ICVN	MUL	2.544	8.05	.90	PASS							
1	ICVN	PUL	2.549	8.57	.92	PASS							
2	V34-6250	RUL	2.565	8.20	.95	PASS							
2	V34-6250	MUL	2.531	8.80	.91	PASS							
2	V34-6250	PUL	2.565	8.13	.92	PASS							
3	V34-6250	RUL	2.531	7.05	.93	PASS							
3	V34-6250	MUL	2.530	7.00	.93	PASS							
3	V34-6250	PUL	2.535	7.53	.91	PASS							
4		RUL				S							
4		MUL				S							
4		PUL				S							

COMMENT: S/N: VS-0554 Calibration Date: 03/22/07

DISPENSER #4 IS DOWN; WOULD NOT PUMP.





City of Cleveland  
Jane L. Campbell, Mayor

Department of Public Health  
Division of Air Quality  
1925 St. Clair Avenue  
Cleveland, Ohio 44114-2080  
216/664-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

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

VIA HAND DELIVERY  
 VIA CERTIFIED MAIL: \_\_\_\_\_

Date: 7/30/07

Owner: Shri DAVE

Facility Name: ~~28~~ LAKESHORE GAS

Address: 21820 Lakeshore BLVD EUCLID, OH

Inspector: LINDA KIMMY (216.664.2985)

**FACILITY ID:** 13-18-20-7277

**NOTICE OF VIOLATION: STAGE II REQUIREMENTS**

The Cleveland Division of Air Quality (CDAQ) inspected the above reference facility. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions. Violations are noted by checkboxes before the paragraph; each checked item is a violation of the Ohio Administrative Code (OAC) noted in that paragraph, and a separate violation of Ohio Revised Code (ORC) Section 3704.05(G).

- Failure to provide a copy of the most recent permit-to-operate (PTO) issued to your facility. *Violation of OAC 3745-21-09(DDD)(3)(a)(v)*
- Failure to provide a copy of the most recent PTO application and emissions activity category form for your facility. *Violation of OAC 3745-21-09(DDD)(3)(a)(iv)*
- Failure to submit a PTO application and emissions activity category form for your facility. *Violation of OAC 3745-35-02(A)*
- Failure to submit a permit-to-install (PTI) application and emissions activity category form for your facility. *Violation of OAC 3745-31-02(A)(1)*
- Failure to conduct an Air-to-Liquid Ratio test within 12 months on your gasoline dispensing facility. *Violation of OAC 3745-21-09(DDD)(2)(f)*
- Failure to conduct a Static Leak test within 12 months on your gasoline dispensing facility. *Violation of OAC 3745-21-09(DDD)(2)(f)*
- Failure to conduct a Dynamic Pressure test within 5 years on your gasoline dispensing facility. *Violation of OAC 3745-21-09(DDD)(2)(d)*
- Failure to provide a copy of the most recent Stage II test results for your gasoline dispensing facility. *Violation of OAC 3745-21-09(DDD)(3)(a)(ii)*
- Failure to provide a copy of the certificate issued to the Stage II Compliance Specialist for your gasoline dispensing facility. *Violation of OAC 3745-21-09(DDD)(3)(a)(vi)*
- Failure to submit Stage II test results to CDAQ within 30 days of completing the test. *Violation of OAC 3745-21-09(DDD)(2)(c)*
- Your gasoline dispensing facility has been issued PTI 13-04228 the violations listed above are also violations of this PTI and ORC Section 3704.05(C).
- Your gasoline dispensing facility has been issued a PTO on 7/10/03 (110) violations listed above are also violations of this PTO and ORC Section 3704.05(C).



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. 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. Your written response should be addressed to the inspector listed on the first page of this letter and mailed to:

Cleveland Division of Air Quality  
1925 St. Clair Avenue NE  
Cleveland, Ohio 44114-2080

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 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 Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.state.oh.us/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by the OCAPP.

Facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production can contact the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.state.oh.us/ocapp> or (614) 644-3469 or (800) 329-7518 and 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 CDAQ at 216-664-2297 and ask for the inspector on the first page of this letter. All correspondence with CDAQ must include the Ohio EPA facility identification number listed on the first page of this letter.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File