



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 7000 0600 0022 4716 6375  
RETURN RECEIPT REQUESTED

May 17, 2012

Chong "Kim" Ko  
Owner  
Town and Country Cleaners  
150 Bell St.  
Chagrin Falls, OH 44022

NON-HPV

FACILITY ID: 13-18-13-8190

**LETTER OF WARNING:** Failure to conduct leak checks and utilize a halogenated hydrocarbon detector for emissions unit D003: Supermatic dry to dry cleaning machine

Dear Ms. Ko:

On May 15, 2012, the Cleveland Division of Air Quality (CDAQ) inspected Town and Country Cleaners located at 150 Bell Street in Chagrin Falls. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Town and Country Cleaners operation of emissions units (EU) D003: Supermatic dry to dry cleaning machine is in violation of Title 40 Code of Federal Regulations (CFR) Subpart M Section 63.322(o)(1)(i) which states that area sources shall conduct monthly inspections using a halogenated hydrocarbon detector or perchloroethylene (PCE) gas analyzer that is operated according to the manufacturer's instructions. The operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface periphery. Town and Country Cleaners has failed to utilize a halogenated hydrocarbon detector or PCE gas analyzer.

Title 40 CFR Subpart M Section 63.322(k) and (l) also requires that the owner or operator of a small area source dry cleaning system inspect the system bi-weekly for perceptible leaks while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection for perceptible leaks.

CDAQ is in receipt of an updated permit-to-install/operate (PTIO) application submitted on 5/15/2012. Issuance of a PTIO is contingent upon the demonstrated use of a halogenated hydrocarbon detector or a PCE gas analyzer by Town and Country Cleaners.



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Town and Country Cleaners submit an invoice demonstrating proof of purchase of a halogenated hydrocarbon detector or a PCE gas analyzer and a copy of a completed leak check utilizing the leak detector to the following enforcement representative within thirty (30) days of receipt of this letter:

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

If there is insufficient time to correct the alleged violations within this timeframe, a written response which includes a timeline for correcting the alleged violations must be received within thirty (30) days of receipt of this letter.

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.

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 Town and Country Cleaners: 13-18-13-8190.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/mm LK

cc: George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
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