



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 7002 2030 0001 1808 4338  
RETURN RECEIPT REQUESTED**

December 4, 2007

Mr. Bill Roblin  
Dorn Color, Inc.  
11555 Berea Road  
Cleveland, Ohio 44102

**HIGH PRIORITY FACILITY  
EMISSIONS VIOLATION**

**FACILITY ID: 1318000025**

**Notice of Violation: Operating without a Permit-To-Install (PTI) and/or a Permit-To-Operate (PTO) and improper recordkeeping**

Dear Mr. Roblin:

On November 19, 2007, the Cleveland Division of Air Quality (CDAQ) inspected Dorn Color, Inc. (Dorn) located at 11555 Berea 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:

Dorn's operation of the Global Finishing System spray booth, model Concept 1000, is in violation of the Ohio Administrative Code (OAC) Rule 3745-31-02 (A) (1) and 35-02 (A), the Ohio Revised Code (ORC) 3704.05 (F) and (G), and the City of Cleveland Ordinance #259.02 for operating an emissions source without first applying for and obtaining a PTI and/or a PTO since July 2004.

Dorn's operation of the Global Finishing System spray booth is also in violation of OAC Rule 3745-21-09 (B) (3), for failing to maintain daily records.

Dorn's operation of K001: Continuous web coating line with catalytic incinerator is in violation of the monitoring and recordkeeping requirements of PTI# 13-03614. Dorn failed to record all 3-hour blocks (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

Dorn also has failed to ensure that the monitoring and recording devices were capable of accurately measuring the desired parameter as outlined in PTI#13-03614. During the inspection CDAQ observed the temperature chart and the digital temperature monitor recording at different temperatures.



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Dorn Color, Inc. submit PTI and PTO applications, which were previously sent on November 23, 2007, for the Global Finishing System spray booth and a corrective action plan to ensure future compliance on K001 to the following enforcement representative:

Linda Kimmy  
Cleveland Division of Air Quality  
1300 East Ninth Street  
Penton Media Building  
Cleveland, Ohio 44114

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.

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 Linda Kimmy at 21-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Dorn Color, Inc.: 1318000025.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

GB/LK<sub>W</sub>

cc:

Richard Nemeth and Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318000025\2007-11-23 NOV.doc

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, & 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. Bill Roblin  
 DORN COLOR, INC.  
 11555 Berea Road  
 Cleveland, OH 44102

 2. Article Number  
 (Transfer from service label)

7002 2030 0001 1808 4338

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

 x *C. Roblin*  Agent  
 Addressee

B. Received by (Printed Name)

C. ROBILIN

C. Date of Delivery

 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