



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erievue 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 7002 0860 0006 9069 3309  
RETURN RECEIPT REQUESTED**

April 17, 2007

Gerald Reichelt  
Plant Manager  
Alumitech of Cleveland, Inc. (Alumitech)  
4181 Bradley Road  
Cleveland, Ohio 44109

**HIGH PRIORITY FACILITY  
EMISSIONS VIOLATION**

**FACILITY ID: 13-18-00-0062**

**Notice of Violation: Violating Operating Restrictions of Permit-to-Install (PTI) #13-3175**

Dear Mr. Reichelt:

On April 13, 2007, the Cleveland Division of Air Quality (CDAQ) received the 2006 third quarter deviation report and the 2007 first quarter deviation report from Alumitech located at 4181 Bradley 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.

~~Alumitech's operation of emissions units P910 and P911 is in violation of the baghouse~~ operational restrictions and the baghouse monitoring and recordkeeping requirements of PTI#13-3175 and the Ohio Revised Code (ORC) 3704.05 (C).

PTI#13-3175 Baghouse Operational Restrictions states the pressure drop range for these emissions units must be maintained at 4.0 to 5.0 inches water while the emissions unit is in operation. The Baghouse Pressure Drop Monitoring and Recordkeeping Requirements state the permittee shall record the pressure drop across each baghouse on an hourly basis.

Since August of 2006, quarterly deviation reports identify pressure drop deviations of 2.0 inches water (September 22, 2006) to 16.0 inches water (February 4, 2007). Those quarterly deviation reports also identify monitoring and recording of pressure drop readings being conducted 6 times daily opposed to hourly.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests Alumitech to submit written documentation from the baghouse manufacturer to support Alumitech's claim that no excess emissions resulted from the deviations in pressure drop, the control efficiency of the baghouse for non-permitted pressure drops. CDAQ also request an explanation for the decrease in frequency for pressure drop monitoring and recording to the following enforcement representative:



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

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.

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 Valencia White at 216-664-2953. All correspondence with CDAQ must include the Ohio EPA facility identification number for Alumitech: 13-18-00-0062.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

GB/vw

cc: Eric Yates, Ohio EPA Central Office (w/ enclosures)  
Richard Nemeth and Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
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