



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 7002 0860 0006 9069 3323
RETURN RECEIPT REQUESTED**

May 17, 2007

Steven J. Murawski
Baker & McKenzie LLP
One Prudential Plaza, suite 3500
130 East Randolph Drive
Chicago, IL 60601

**FACILITY ID: 13-18-00-0062
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Murawski:

On April 17, 2007, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Alumitech of Cleveland, Inc. (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 requested an explanation for the decrease in frequency for pressure drop monitoring and recording.

CDAQ is in receipt of a response dated May 3, 2007, requesting to change the pressure drop ranges from 4.0 to 5.0 inches of water to 2.0 to 12.0 inches of water. The response also included a copy of the modified PTI #13-3175 dated September 3, 1997 allowing Alumitech to record pressure drops once per shift.

CDAQ is currently working on a Chapter 13 modification for emissions units P910: Rotary Exothermic Dryer

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

Sincerely,

Valencia White

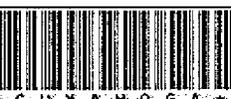
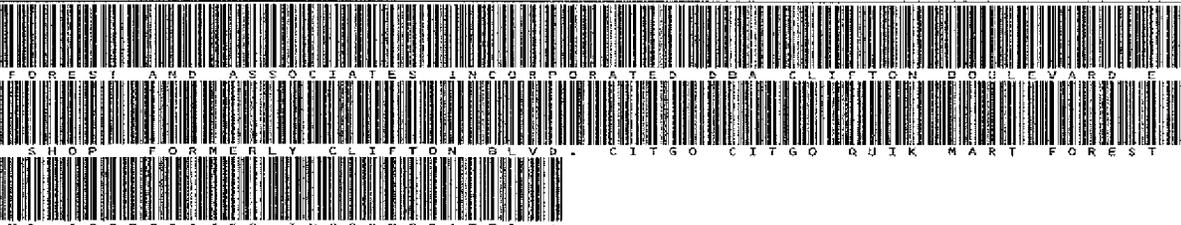


Field Enforcement Manager, CDAQ

cc: Gerald Reichelt, Alumitech (Certified Mail #
James Buckert, Aleris International, Inc. (Certified Mail #
Stephen Feldmann, Ohio EPA Central Office
Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Reference\temp\enforcement\Follow-Up.dot

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each NOV document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * * *
County	County	 * C U Y A H O G A *
ID info	1318005793	 * 1 3 1 8 0 0 5 7 9 3 *
Name		 * F R E S I A N D A S S O C I A T E S I N C O R P O R A T E D D D A C L I F T O N D O S I E V A R D F Z S H O P F O R M E R L Y C L I F T O N B L V D . C I T G O C I T G O R U I K M A R T F O R E S T A N D A S S O C I A T E S I N C O R P O R A T E D *
Date:	7/11/2011	 * 7 / 1 1 / 2 0 1 1 *
Record ID	CDAQ_12089	 * C D A Q 1 2 0 8 9 *

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL : 7009 3410 0002 1934 1677
RETURN RECEIPT REQUESTED

July 11, 2011

Chris Forest
Forest and Associates, Inc.
11521 Clifton Blvd.
Cleveland, Ohio, 44102

NON-HPV

FACILITY ID: 13-18-00-5793

NOTICE OF VIOLATION : Failing annual Stage II compliance test.

Dear Mr. Forest:

On July 8, 2011, the Cleveland Division of Air Quality (CDAQ) witnessed the annual Stage II compliance test at Clifton EZ Shop located at 11521 Clifton Boulevard 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.

On July 8, 2011, Clifton EZ Shop failed their annual Air-to-Liquid (A/L) Ratio test for pumps #2, #3, and #4. The failure to successfully pass the testing requirements is in violation of Ohio Administrative Code (OAC) Rule 3745-21-09 (DDD)(2) while causing, allowing or permitting the transfer of gasoline from a stationary storage tank into a motor vehicle, Ohio Revised Code (ORC) Section 3704.05 (G), and OAC Rule 3745-21-09 (DDD)(1)(c).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Clifton EZ Shop make the necessary repairs, then re-test and submit the July 8, 2011, test results, and the re-test results within thirty (30) days from their respective test dates as stipulated in OAC Rule 3745-21-09(DDD)(2)(c) to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839



If there is insufficient time to correct the alleged violations within this timeframe, a written response must be received within thirty (30) days that includes 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 Bryan Sokolowski at 216-420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Clifton EZ Shop: 13-18-00-5793.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/BS

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
Chris Forest, Clifton EZ Shop
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005793\2011-7-8 NOV.doc

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL : 7009 3410 0002 1934 2117
RETURN RECEIPT REQUESTED

August 3, 2011

Robert Forest
Forest and Associates, Inc.
3825 Eastlake Road
Sheffield Lake, Ohio, 44054

FACILITY ID: 13-18-00-5793
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Forest:

On July 11, 2011, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Clifton EZ Shop located at 11521 Clifton Boulevard in Cleveland, to make the necessary repairs, then re-test and submit the July 8, 2011, test results, and the re-test results. On July 22, 2011, Clifton EZ Shop retested, and passed, the Air-to-Liquid Ratio test for pumps #2, #3, and #4. CDAQ received a copy of the original and re-test results on July 25, 2011.

The corrective action plan was received in a timely manner and 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Clifton EZ Shop: 13-18-00-5793.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/BS



cc: Chris Forest, Clifton EZ Shop
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005793\2011-7-8 NEAR.docx

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each **NOV** document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * * *
County	County	 * C O U N T Y *
ID Info	1318005785	 * 1 3 1 8 0 0 5 7 8 5 *
Name		 * B R A D E N S U L P H U R I N K C O M P A N Y *
Date:	4/3/2009	 * 4 / 3 / 2 0 0 9 *
Record ID	CDAQ_10276	 * C D A Q 1 0 2 7 6 *



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
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www.clevelandhealth.org

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

**CERTIFIED MAIL : 7002 2030 0001 1807 9815
RETURN RECEIPT REQUESTED**

August 6, 2009

Mr. Jeff Thomas
Braden Sutphin Ink Company
3650 East 93rd Street
Cleveland, Ohio 44105

**FACILITY ID: 13-18-00-5785
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Thomas:

On April 3, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Braden Sutphin Ink Company to submit a Permit to Install/Operate (PTIO) Application and an Emission Activity Category Form for the Ink Tub Washer and submit 2006, 2007, and 2008 city permit fees. On May 21, 2009, CDAQ received a corrective action plan which included payment of 2006, 2007, and 2008 city permit fees and a request for an extension of the due date for submittal of the PTIO Application.

Braden Sutphin Ink Company was thought to have used a high volatile organic compound (VOC) acid neutralizer and mill-floor wash in the Ink Tub Washer. During a telephone conversation with Mr. Thomas, on June 19, 2009, CDAQ learned that the acid neutralizer and mill-floor wash are not used in the Ink Tub Washer. They are used in different applications resulting in the Ink Tub Washer being de minimis and not requiring a PTIO Application.

Also, CDAQ acknowledges that Braden Sutphin Ink Company has replaced their high VOC acid neutralizer and mill-floor wash with a low VOC product. CDAQ received a copy of the MSDS sheets on August 4, 2009.

The corrective action plan was received and 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Braden Sutphin Ink Company: 13-18-00-5785.

Sincerely,

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

George Baker
Chief of Enforcement, CDAQ

GB/BS W

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005785\2009-3-20 NEAR.docx

Bryan Sokolowski

From: bwg613@aol.com
Sent: Tuesday, July 14, 2009 3:39 PM
To: jthomas@bsink.com
Subject: volatile components

Jeff, As we discussed on our phone conversation: Chem-Quip is reformulating the mill floor wash you currently use to not contain any volatile components; i.e. butyl derivatives. This MSDS is available upon manufacture or earlier if requested. I also am confirming that our acid neutralizer contains no volatile components except water. Please call me if you have any further questions.

Regards, Bryan

Stay cool with this summer's hottest movies. [Moviefone brings you trailers, celebrities, movie showtimes and tickets!](#)

Post-It Fax Note 7571

Date	7/28/09	# of Pages	2
To	Jeff Thomas		
From			
Cell	Co. Chem Equip		
Phone #			
Fax #	216 640-2859		

MATERIAL SAFETY DATA SHEET

ACID NEUTRALIZER DOUBLE STRENGTH

Latest Revision Date... 07/28/09

Print Date... 07/28/09

SECTION 1 MANUFACTURER INFORMATION

CHEM-EQUIP, INC.
 2176 Lyndway Road
 Cleveland, Ohio 44122
 Phone: (216) 291-0008 Fax: (216) 291-0042

FOR CHEMICAL EMERGENCY
CALL INFOTRAC @ 1-800-535-5053
24 HRS/DAY, 7 DAYS/WEEK

SECTION 2 PRODUCT IDENTIFICATION

PRODUCT NUMBER..... CQ ANDS
 TRADE NAME OR CHEMICAL NAME... ACID NEUTRALIZER DOUBLE STRENGTH
 SYNONYMS..... NA
 CHEMICAL FAMILY..... Acid Cleaner
 NFPA - HEALTH HAZARD..... 3
 FIRE HAZARD..... 0
 REACTIVITY HAZARD..... 2
 NFPA SCALE..... 1-Extreme 2-High 3-Moderate 4-Slight 0-Insignificant
 KEY..... NA= Not Applicable ND= Not Determined

SECTION 3 HAZARDOUS INGREDIENTS

CHEMICAL NAME(S)	CAS NUMBER	LC	TLV-TWA	PEL	SEQ. III	CARCINOGEN?
Phosphoric Acid	7664-38-2	.55	1 mg/m3	1 mg/m3	Yes	NO

SECTION 4 SHIPPING DATA

D.O.T. PROPER SHIPPING NAME... Phosphoric Acid, solution
 D.O.T. HAZARD CLASS..... Corrosive Material Class 9
 D.O.T. LABELS REQUIRED..... Corrosive
 UN/NA I.D. NUMBER..... UN 1805
 PACKAGING GROUP..... III
 NON-BULK SHIPPING NAME..... Phosphoric Acid, Solution, 9, UN 1805, PG III
 BULK SHIPPING NAME..... NA

SECTION 5 PHYSICAL DATA

BOILING/Freezing Point @760 mmHg... ND / ND
 pH..... 1.5 (10% Solution)
 VAPOR PRESSURE mm Hg @30° C..... ND
 VAPOR DENSITY (AIR = 1)..... ND
 PERCENT VOLATILE BY WEIGHT (%)..... 45 (Water)
 SPECIFIC GRAVITY @20°C..... 1.33
 SOLUBILITY IN WATER..... Complete
 EVAPORATION RATE..... (Water) <1
 APPEARANCE AND ODOR..... Clear liquid

SECTION 6 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Test Method)..... NA
 AUTOIGNITION TEMPERATURE..... NA
 FLAMMABILITY LIMITS IN AIR (% V)..... NA

ACID NEUTRALIZER DOUBLE STRENGTH**SECTION 6****FIRE AND EXPLOSION HAZARD DATA**

CONT'D

EXTINGUISHING MEDIA..... Not combustible

SPECIAL FIRE FIGHTING PROCEDURES... Material is strongly acidic. Beware of contact.

UNUSUAL FIRE & EXPLOSION HAZARDS... Containers exposed to intense heat from fires should be cooled with water to prevent vapor pressure build up which could result in container rupture.

SECTION 7**REACTIVITY DATA**

PRODUCT STABILITY..... Stable

Conditions to Avoid..... NA

CHEMICAL INCOMPATIBILITY..... Strong alkalis, soft metals (evolution of flammable gas)

HAZARDOUS DECOMPOSITION PRODUCTS... Toxic phosphorus oxides fumes

HAZARDOUS POLYMERIZATION..... Will Not Occur

SECTION 8**HEALTH HAZARD DATA**

SKIN CONTACT... Irritation possible upon contact.

EYE CONTACT... Irritation upon contact, may cause burns upon prolonged contact.

INHALATION..... Mists may cause irritation.

INGESTION..... May cause nausea and vomiting.

SECTION 9**EMERGENCY AND FIRST AID PROCEDURES**

SKIN..... Remove contaminated clothing and flush exposed skin with soap and water. If irritation persists or develops, get medical attention. Launder contaminated clothing before reuse.

EYES..... Immediately flush eyes with large amounts of water for 15 minutes and get medical attention.

INGESTION... If swallowed, DO NOT INDUCE VOMITING. Get medical attention immediately. Never give anything by mouth to an unconscious person.

INHALATION... Move to fresh air. Aid in breathing, if necessary, and get medical attention.

SECTION 10**ENVIRONMENTAL DATA**

SPILL OR LEAK PROCEDURES... Avoid skin contact. Neutralize with appropriate material and absorb with sand or inert material. Place into suitable container for disposal. Flush neutralized residues with water to sanitary sewer.

WASTE DISPOSAL METHOD..... Corrosive. Dispose of in accordance with all federal, state and local regulations.

HAZARDOUS WASTE 40CFR261... Yes. Hazardous Waste Number: D002

CONTAINER DISPOSAL..... Empty containers may contain residuals. Thoroughly clean, then offer for recycling, reuse, or disposal in accordance with governmental regulations.

SECTION 11**SPECIAL PROTECTION INFORMATION**

RESPIRATORY PROTECTION..... NIOSH/MSHA approved can or cartridge respirator for gas and vapor as needed to maintain P.E.L.

VENTILATION..... Local and/or mechanical exhaust to maintain exposure below P.E.L.

PROTECTIVE CLOTHING..... Neoprene gloves, full chemical suit, boots - as necessary to prevent skin contact.

EYE PROTECTION..... Chemical goggles and/or full face shield.

OTHER PRECAUTIONS..... Safety shower and eyewash fountains should be easily accessible.

SECTION 12**SUPPLIER INFORMATION**

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of manufacturer. The date on this sheet relates only to the specific material designated herein. Manufacturer assumes no legal responsibility for use or reliance upon this data.

Post-It® Fax Note 7671		Date	8/03/09	Pages	2
To	Jeff Thomas		From		
Co. Dept.			Co.	Chem Equip	
Phone #			Phone #		
Fax #	316-640-2859		Fax #		

MATERIAL SAFETY DATA SHEET

NEW V-1

Latest Revision Date... 07/30/09

Print Date... 08/03/09

SECTION 1

MANUFACTURER INFORMATION

CHEM-QUIP, INC.
 2176 Lyndway Road
 Cleveland, OH 44122
 Phone: (216) 291-0008 Fax: (216) 291-0042

SECTION 2

PRODUCT IDENTIFICATION

PRODUCT NUMBER..... CC 95WV1
 TRADE NAME OR CHEMICAL NAME... NEW V-1
 SYNONYMS..... NA
 CHEMICAL FAMILY..... NA
 NFPA - HEALTH HAZARD..... 1
 FIRE HAZARD..... 0
 REACTIVITY HAZARD..... 0
 NFPA SCALE..... 0=Extreme 1=High 2=Moderate 3=Slight 0=Insignificant
 KEY..... NA= Not Applicable ND= Not Determined

SECTION 3

HAZARDOUS INGREDIENTS

CHEMICAL NAME(S)	CAS NUMBER	1 WT	TDL-TWA	PEL	SEC 123	CARCINOGENY
None	NA	NA	NA	NA	NA	NA

SECTION 4

SHIPPING DATA

D.O.T. PROPER SHIPPING NAME... NA
 D.O.T. HAZARD CLASS..... NA
 D.O.T. LABELS REQUIRED..... NA
 UN/NA I.D. NUMBER..... NA
 PACKAGING GROUP..... NA
 NON-BULK SHIPPING NAME..... Cleaning Compound, liquid
 BULK SHIPPING NAME..... Same

SECTION 5

PHYSICAL DATA

BOILING/Freezing Point @760 mmHg... 215°F (102°C) / <32°F (0°C)
 pH..... 10.3
 VAPOR PRESSURE mm Hg @20° C..... ND
 VAPOR DENSITY (AIR = 1)..... ND
 PERCENT VOLATILE BY WEIGHT (V)..... ND
 SPECIFIC GRAVITY @20°C..... 0.99
 SOLUBILITY IN WATER..... Complete
 EVAPORATION RATE..... (Water=1) -1
 APPEARANCE AND ODOR..... Light green liquid with faint odor.

SECTION 6

FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Test Method)..... NA
 AUTOIGNITION TEMPERATURE..... NA
 FLAMMABILITY LIMITS IN AIR (% V)..... NA

MEW V-1

SECTION 6**FIRE AND EXPLOSION HAZARD DATA**

CONT'D

EXTINGUISHING MEDIA..... Not Combustible
 SPECIAL FIRE FIGHTING PROCEDURES... No special procedures.
 UNUSUAL FIRE & EXPLOSION HAZARDS... No unusual hazards.

SECTION 7**REACTIVITY DATA**

PRODUCT STABILITY..... Stable
 Conditions to Avoid..... NA
 CHEMICAL INCOMPATIBILITY..... NA
 HAZARDOUS DECOMPOSITION PRODUCTS... NA
 HAZARDOUS POLYMERIZATION..... Will Not Occur

SECTION 8**HEALTH HAZARD DATA**

SKIN CONTACT... Continued exposure can cause irritation to the skin.
 EYE CONTACT... Contact will be very irritating to the eyes.
 INHALATION.... Not a route of significant hazard.
 INGESTION..... Irritation and possible scarring of mucousal linings.

SECTION 9**EMERGENCY AND FIRST AID PROCEDURES**

SKIN..... Remove contaminated clothing and flush exposed skin with soap and water. If irritation persists or develops, get medical attention. Launder contaminated clothing before reuse.
 EYES..... Immediately flush eyes with large amounts of water for 15 minutes and get medical attention.
 INGESTION... If swallowed, DO NOT INDUCE VOMITING. Get medical attention immediately. Never give anything by mouth to an unconscious person.
 INHALATION... Move to fresh air. Aid in breathing, if necessary, and get medical attention.

SECTION 10**ENVIRONMENTAL DATA**

SPILL OR LEAK PROCEDURES... Avoid skin contact. Neutralize with appropriate material and flush with water to sanitary sewer.
 WASTE DISPOSAL METHOD..... Corrosive. Dispose of in accordance with federal, state and local regulations.
 HAZARDOUS WASTE 40CFR261... Yes. Hazardous Waste Number: D002
 CONTAINER DISPOSAL..... Empty containers may contain residuals. Thoroughly clean, then offer for recycling, reuse, or disposal in accordance with all regulations.

SECTION 11**SPECIAL PROTECTION INFORMATION**

RESPIRATORY PROTECTION..... NIOSH/MSHA approved filter type mask for dusts, fumes and mists as needed to maintain P.E.L.
 VENTILATION..... Local and/or mechanical exhaust to maintain exposure below P.E.L.
 PROTECTIVE CLOTHING..... Neoprene gloves, apron, boots - as necessary to prevent skin contact.
 EYE PROTECTION..... Chemical goggles.
 OTHER PRECAUTIONS..... Safety shower and eyewash fountains should be easily accessible.

SECTION 12**SUPPLIER INFORMATION**

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of manufacturer. The data on this sheet relates only to the specific material designated herein. Manufacturer assumes no legal responsibility for use or reliance upon this data.



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
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www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL: 7002 2030 0001 1808 7742
RETURN RECEIPT REQUESTED

May 25, 2009

Mr. Michael Willi
Braden Sutphin Ink Company
3650 East 93rd Street
Cleveland, Ohio 44105

NON-HPV

FACILITY ID: 13-18-00-5785

RECEIPT OF CORRECTIVE ACTION PLAN: Operating an Emission Unit (EU) without first obtaining a Permit, and failing to pay city permit fees.

Dear Mr. Willi:

On April 3, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requesting that Braden Sutphin Ink Company submit a Permit to Install/Operate (PTIO) Application and an Emission Activity Category Form for the Ink Tub Washer; and submit city permit fees for all EU's for the calendar years of 2006, 2007, and 2008. CDAQ is in receipt of a corrective action plan and payment of the required city fees dated May 18, 2009. You are expected to comply with submitting PTIO applications by June 25, 2009. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Braden Sutphin Ink Company: 13-18-00-5785.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

VW/BS



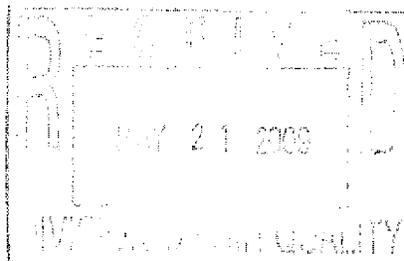
cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005785\2008-8-20 RCAP.docx



**BRADEN SUTPHIN
I N K C O M P A N Y**

THE COLOR OF LEADERSHIP
SHECTED | HEATAFT | FLEKO

May 18, 2009



Mr. Bryan Sokolowski
City of Cleveland, Local Air Agency, OH EPA
75 Erieview Plaza 2nd Floor
Cleveland, OH 44114

Dear Mr. Bryan Sokolowski,

This letter is in response to the notification sent to us by your department dated 4-3-09 covering the violations identified during your most recent visits to our facility. Also, acknowledgement of the three City of Cleveland Air Contaminant Source Invoices received by us on 4-14-09, which have all been satisfied to the amount of 1,050.00 on 4-27-09, check #255458.

We are in the process of completing and filing the PTI and PTIO application and have been in contact with Adrienne LaFarve with the (EPA) Office of Compliance & Assistance, Pollution Prevention for her assistance concerning our Tub Wash Department. We are working diligently to satisfy all permitting issues in a timely manner to bring us back into compliance.

Please contact me with any further questions or concerns you may have.

Sincerely,

Michael J. Willi
Plant Manager,
Braden Sutphin ink Company

Cc: Jim Leitch, CEO
Dan Martin, Operations Manager
Marc Castillo, Technical Manager



City of Cleveland
Frank C. 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 9296
RETURN RECEIPT REQUESTED**

April 3, 2009

Mr. Michael Willi
Braden Sutphin Ink Company
3650 East 93rd Street
Cleveland, Ohio 44105

NON-HPV

FACILITY ID: 13-18-00-5785

NOTICE OF VIOLATION : Operating an Emission Unit (EU) without first obtaining a Permit, and failing to pay city permit fees.

Dear Mr. Willi:

On March 20, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Braden Sutphin Ink Company located at 3650 East 93rd Street 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.

Braden Sutphin Ink Company's, operation of the Ink Tub Washer, is in violation of Ohio Administrative Code (OAC) Rule 3745-31-02 (A)(1)(b), Ohio Revised Code (ORC) Section 3704.05 (G), and City of Cleveland's Codified Ordinances Chapter 257.11(a), for failing to submit Permit-to-Install/Operate (PTIO) Application prior to operating this emission unit. Braden Sutphin Ink Company has been in non-compliance since installation of the emission unit in 2003.

Braden Sutphin Ink Company is also in violation of the City of Cleveland's Codified Ordinance Chapter 263.01 (a)(2), for failing to pay city permit fees for all EU's.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Braden Sutphin Ink Company submit a PTIO Application and an Emission Activity Category Form for the Ink Tub Washer; and submit city permit fees for all EU's for the calendar years of 2006, 2007, and 2008 (invoices, PTIO, and EAC forms enclosed) to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839



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.

The appropriate permit application(s) and supplemental form(s) are included with this letter. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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 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. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Braden Sutphin Ink Company: 13-18-00-5785.

Sincerely,

Valencia White

Field Enforcement Manager, CDAQ

VW/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005785\2008-3-20 NOV.docx

encl: PTIO Application, EAC Form, and City of Cleveland – Permit Fee Invoices

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each NOV document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * *
County	County	 * C U Y A H O G A *
ID info	1318005888	 * 1 3 1 8 0 0 5 8 8 8 *
Name		 * S P R I N G C O M E T A L C O A T I N G *
Date:	7/23/2009	 * 7 / 2 3 / 2 0 0 9 *
Record ID	CDAQ_10677	 * C D A Q 1 0 6 7 7 *



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 2030 0001 1807 9785
RETURN RECEIPT REQUESTED

July 23, 2009

Robert Wolf
Springco Metal Coating
12500 Elmwood Avenue
Cleveland, Ohio 44111

NON-HPV

FACILITY ID: 13-18-00-5888

NOTICE OF VIOLATION : Operating Emission Units (EU) without first obtaining a permit-to-install/operate (PTIO), failing to pay city permit fees, failure to maintain proper monitoring and recordkeeping requirements, failure to submit deviation reports

Dear Mr. Robert Wolf:

On June 16, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Springco Metal Coating located at 12500 Elmwood Avenue 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.

Springco Metal Coating's operation of Burn-off Ovens PTR-588, PTR-565, and PTR-549, are in violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(b), Ohio Revised Code (ORC) Section 3704.05 (F), and City of Cleveland's Codified Ordinances Chapter 257.11(a), for failing to submit PTIO applications prior to operating these emission units.

Springco Metal Coating's operation of emission units N002: #2 Burn-off oven, N003: #3 Burn-off oven, and N005: #5 Burn-off oven (N002, N003, and N005) are in violation of PTI #13-03791, Part II – Special Terms and Conditions (A)(2)(c), and ORC Rule 3704.05(C) for failing to be serviced every 6-months by a qualified incinerator contractor;

And, Part II: Special Terms and Conditions (B) for failing to maintain the following Operational Restrictions:

1. This incinerator shall be operated only by adequately instructed personnel
2. Ashes shall be removed from the primary chamber on a daily basis



3. The afterburner chamber shall be inspected and cleaned monthly;

And, Part II – Special Terms and Conditions (C), OAC Rule 3745-31-02(A)(1)(c)(i), and ORC Rule 3704.05(C) for failing to maintain the following monitoring and recordkeeping requirements:

The permittee shall collect and record the following information each day:

- a. The batch operating times for the Emission Unit
- b. A log recording the date and the name of the person who removed the ashes
- c. The temperature of the secondary chamber
- d. Copies of contractor's invoices of maintenance and repairs shall be maintained on site

And Part II: Special Terms and Conditions (D) for never submitting quarterly deviation reports.

Also, Annual Volatile Organic Compound (VOC) emission reports and quarterly deviation reports for EU K001 have not been submitted which is in violation of PTI # 13-03823, Part II – Special Terms and Conditions (D)(2) and (D)(3), and ORC Rule 3704.05(C).

In addition, Springco Metal Coating is in violation of the City of Cleveland's Codified Ordinance Chapter 236.01(a)(2), for failing to pay 2006-2009 city permit fees.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Springco Metal Coating submit city permit fees within two weeks to CDAQ at the following address:

City Permit Fees
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that Springco Metal Coating submit PTIO applications and Emission Activity Category (EAC) forms for Burn-off Ovens PTR-588, PTR-565, and PTR-549 within 30 days to the following CDAQ representative:

David Hearne
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839



CDAQ also requests the following from Springco Metal Coating:

1. Begin submitting quarterly deviation reports for EU's K001, N002, N003, and N005, starting with the 3rd quarter of 2009, due no later than October 31, 2009, that covers the previous calendar quarter
2. Begin submitting an Annual VOC emission report for EU K001 starting with 2009, due no later than March 31, 2010
3. Submit a sample of the following monitoring and recording keeping requirements for EU N002, N003, and N005 within 14 days of receipt of letter:
 - a. The batch operating times
 - b. A log recording the date and the name of the person who removed the ashes
 - c. The temperature of the secondary chamber
4. Submit a maintenance invoice showing EUs N002, N003, and N005 being serviced by a qualified incinerator contractor; and thereafter, every 6 months

Please send the above items to:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

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.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through 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.

CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Springco Metal Coating: 13-18-00-5888.

Sincerely,

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

George Baker
Chief of Enforcement

GB/BS |K

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005888\2009-6-16 NOV.docx

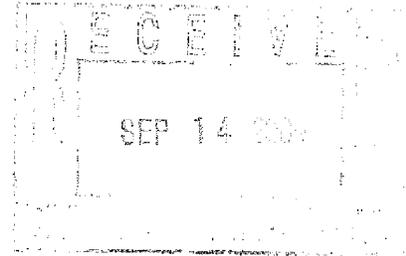
encl: City Fee Invoices for 2006-2009



August 26, 2009

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114

Facility ID: 13-18-00-5888



Dear Mr. Bryan Sokolowski:

This letter is in response to the Notice of Violation dated July 23, 2009.

At present, every available attempt is being performed to gather the pertinent information needed to complete the PTIO for Burn-off ovens PTR-588, PTR-565 and PTR-549. When this is complete, the finalized report will be expedited. Robin Jarjabka will be meeting with Adrienne Lafavre from OCAPP on September 16, 2009 to look over the PTIO for these units.

In reference to the other units, N002, N002 & N004, all training and inspection of the latter are performed in house. Maintenance personnel that service and operate the aforementioned units complete preventative maintenance on a weekly basis; attached are copies of their most recent individual logs. Also, operation of the units is limited to qualified maintenance personnel and a select number of employees authorized; list of names attached. As represented within that list, the employee exposure is very limited and select.

When speaking to maintenance on/of the Burn-off ovens, this is solely limited to the maintenance personnel of Springco; a third party is not employed. Attached is the log sheet that will be used, going forward, for monitoring and record-keeping requirements.

Furthermore, the Burn-off ovens in use at Springco are not incinerators nor are they used as such. In reference from Pollution Control Products booklet, it states "**Controlled Pyrolysis Burn-Off Furnaces are not incinerators. The furnace should be used only to reclaim metal parts for salvage and/or rebuilding by removing conventional hydrocarbon coatings (paint/powder coatings, oil/grease coatings) from metal parts.**" This clearly explains the use of the oven is not for that of incinerating but to strip the parts. Attached is the reference material provided by Pollution Control Products.

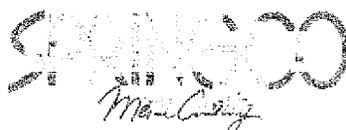




According to our permit for K001 it states, " The permittee shall submit to the Cleveland BAPC an annual emissions report including the VOC emissions for the coating line. This report shall be submitted no later than the end of the first quarter following the previous calendar year." (D3)

If you need anymore information please feel free to contact me at 216-941-0020 x 130, or by e-mail rwolf@springco-coatings.com.

Robert E. Wolf
Vice President Plant Maintenance & Engineering



MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: _____ DATE: 8-19-09
TIME IN: _____ TIME OUT: _____
BREAK TIME: _____ LUNCH TIME: _____

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) PM Rock Bean Factory spec / SOP - 3-6
- 2) _____
- 3) _____
- 4) _____
- 5) _____
- 6) _____
- 7) _____
- 8) _____
- 9) _____
- 10) _____
- 11) _____
- 12) _____
- 13) _____
- 14) _____

**LIST ALL SUPPLIES USED ON THE JOB: _____

- 1) _____
- 2) _____
- 3) _____
- 4) _____

** LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)

- 1) _____
- 2) _____
- 3) _____
- 4) _____
- 5) _____

***** THIS SHEET MUST BE TURNED IN DAILY *****

MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: _____ DATE: 8-19-09

TIME IN: _____ TIME OUT: _____

BREAK TIME: _____ LUNCH TIME: _____

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

1) FM Rock Burner Per SOP 1-3

2) _____

3) _____

4) _____

5) _____

6) _____

7) _____

8) _____

9) _____

10) _____

11) _____

12) _____

13) _____

14) _____

15) _____

****LIST ALL SUPPLIES USED ON THE JOB:** _____

1) _____

2) _____

3) _____

4) _____

5) _____

**** LIST ANY PROBLEMS ON ANY-JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)** _____

1) _____

2) _____

3) _____

4) _____

5) _____

MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: _____ DATE: 7-30-09
TIME IN: _____ TIME OUT: _____
BREAK TIME: _____ LUNCH TIME: _____

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) PM Rock Burn Factory spec / scf 3-6
- 2) _____
- 3) _____
- 4) _____
- 5) _____
- 6) _____
- 7) _____
- 8) _____
- 9) _____
- 10) _____
- 11) _____
- 12) _____
- 13) _____
- 14) _____

**LIST ALL SUPPLIES USED ON THE JOB: _____

- 1) _____
- 2) _____
- 3) _____
- 4) _____

** LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)

- 1) _____
- 2) _____
- 3) _____
- 4) _____
- 5) _____

***** THIS SHEET MUST BE TURNED IN DAILY *****

MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: _____ DATE: 7-30-09
TIME IN: _____ TIME OUT: _____
BREAK TIME: _____ LUNCH TIME: _____

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) FM Rack Burner Per SOP 1-3
- 2) _____
- 3) _____
- 4) _____
- 5) _____
- 6) _____
- 7) _____
- 8) _____
- 9) _____
- 10) _____
- 11) _____
- 12) _____
- 13) _____
- 14) _____
- 15) _____

****LIST ALL SUPPLIES USED ON THE JOB:** _____
1) _____
2) _____
3) _____
4) _____
5) _____

**** LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)** _____
1) _____
2) _____
3) _____
4) _____
5) _____

Memorandum

To: All managers, all large line foremen, and all assigned rack burner employees.

CC: Paul Springer, and Bob Wolf.

From: Jim Sheffield.

Date: 5/6/09

Re: Rack burner abuse, and foremen supervision required while loading all burners effective Wednesday 5/6/09.

To all receiving this memo,

I am absolutely disgusted with the constant abuse that our "assigned" rack burner employees are causing to all of our rack burners on a daily basis! 2 months ago, we assigned only a select number of employees to do the rack burners around the clock in order to get racks burnt, and get the job done without destroying our rack burning equipment! In this last 2 months, not a day goes by in which I do not get a report that a rack burner has had the walls tore out of it, or that a rack burner has had a water line tore out of it, or that the insulation has been completely tore out of the burner. This is absolutely a total disrespect of company property! What is wrong with you people? Do you not understand that the rack burners are the HEART BEAT of our operation? Without the rack burners, we create rejects, and miss shipments, all consequences in which effect the few customers that we have left in order to keep our doors open for business!!! To refresh everybody's memory as to the employees that we assigned to do rack burners, they are as follows,

Third shift – Dave Kent

First shift = Paul Bartel, Shawn Shea, and Will King

Second shift = Mark Bazdar

Now that everybody is updated on the list of employees who are approved to do the rack burners around the clock, why do I constantly see a host of other employees that are loading, and unloading the rack burners? POOR SUPERVISION, THAT IS WHY!!!

Effective immediately, the approved employees listed above will be the only employees allowed to load, and unload the burners. Furthermore, effective immediately, when it is time to load, or unload a burner, the above listed employees are to get the foreman on duty for their shift to stand by the burner, and supervise the whole operation until the burner is unloaded, and reloaded to assure that no abuse occurs to the burners. I have made an in house report that I want signed off on by each foreman, and turned in with their FOD reports daily. Any abuse that happens in the future in which the foreman on duty is to report, the responsible employee will be terminated, no exceptions! If rack burner abuse happens on a shift, and is not reported

September 11, 2009

by a foreman, I will assume that the on duty foreman did not supervise the operation, and that on duty foreman, and the rack burner employee will be terminated, no exceptions! I am exhausted daily knowing that all of this abuse is taking place, and know body ever knows who did it. You will all now start being held accountable for your actions! Start using care in your jobs; these rack burners are not only an essential part of our business, they are very expensive, and time consuming to fix! The attached report to this memo is to be started by the on duty rack burner prior to starting a burner cycle, and it will be signed off on for each rack burning cycle by the on duty foreman who will turn this report in daily to Jim Sheffield with their FOD reports. Do not forget to turn this report in, and do not cover employees when they cause abuse to company property, because I will not tolerate both violations any longer! I will get to the bottom of this problem, and it will go away, period! We can no longer afford this to go on as a company!

Thank you all for your cooperation in this serious matter,

Jim Sheffield

5/6/09

1.3 WHAT THE CLEANING FURNACE SHOULD NOT BE USED FOR.

Parts such as drip racks, spray booth gratings, etc., that have dangerous or excessive amounts of uncured paint on them must not be pyrolyzed in this furnace until the paint has been cured by putting the parts through a bake oven to evaporate the solvent in the uncured paint. **Do not use the furnace for curing of varnished or painted parts, or other parts which may contain large amounts of volatile solvents. Do not use the furnace for processing parts with uncured paint on them.** This furnace does not have a forced exhaust (because of high temperatures involved in pyrolysis) so it cannot handle excess amounts of solvents that may evaporate at less than 400°F (200°C). Such solvent vapors may fill the furnace at or near room temperature with an explosive mixture which can be ignited when the furnace is turned on. Alternatively, the rapid evolution of such vapors during initial heat-up of the furnace may overwhelm the capacity of the afterburner and lead to a fire in the furnace or exhaust stack.

Controlled Pyrolysis[®] Burn-Off Furnaces **are not incinerators**. The furnace should be used only to reclaim metal parts for salvage and/or rebuilding by removing conventional hydrocarbon coatings (paint/powder coatings, oil/grease coatings) from metal parts. **Do not use the furnace as an incinerator to dispose of waste materials or medical or pathological or nuclear materials.**

DANGER: Do not clean any sealed container, pipe, tank, or other vessel containing any material which may expand when heated and rupture the vessel. This includes water-jacketed stators, heat exchangers, coolers, oil-jacketed pipes, or any other sealed vessel. Plugs, caps, or seals must be removed to prevent explosive forces from rupturing the vessel, destroying the furnace, destroying the building, and injuring or killing people.

Do not process wet paint, paint sludge, waste powder from powder coating operations, paint filters, nitrocellulose paints, solvents, thinners, waste plastic or polymer, PVC (polyvinyl chloride), lead or rubber coated scrap wire or parts, wood, paper, trash, waste oil, waste grease, oil filters, ammunition, explosives, fertilizer, or anything else which may overload the furnace and cause a fire or explosion. The furnace is not designed as an incinerator. It is designed to clean and reclaim metal parts.



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 1807 9884
RETURN RECEIPT REQUESTED

October 15, 2009

Mr. Robert Wolf
Springco Metal Coating
12500 Elmwood Avenue
Cleveland, Ohio 44111

FACILITY ID: 13-18-00-5888
RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION

Dear Mr. Robert Wolf:

On July 23, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Springco Metal Coating pay 2006 through 2009 city permit fees; submit permit-to-install/operate (PTIO) applications for Burn-off Ovens: N002, N003, N005, PTR-588, PTR-565, and PTR-549; submit a sample of the required monitoring and recordkeeping requirements; submit 3rd quarter deviation reports for emission units (EUs) K001: Electro-Deposition Plating Line, N002, N003, and N005 by October 31, 2009; submit an annual Volatile Organic Compound (VOC) emission report for EU K001 for 2009, due by March 31, 2010; and submit a maintenance invoice showing EUs N002, N003, and N005 were serviced by a qualified incinerator contractor; and thereafter, every 6 months.

CDAQ is in receipt of PTIO applications for EU's N002, N003, N005, PTR-588, PTR-565, and PTR-549, 2006 through 2009 city permit fees; and a sample of the required monitoring and recordkeeping requirements, that were enclosed in a letter dated August 26, 2009.

You are still expected to submit 3rd quarter deviation reports for EUs K001, N002, N003, and N005 by October 31, 2009; submit an annual VOC emission report for EU K001 for calendar year 2009, and submit a maintenance invoice showing EUs N002, N003, and N005 were serviced by a qualified incinerator contractor, and thereafter, every 6 months, both of which are due by March 31, 2010. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.



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 Bryan Sokolowski at (216) 420-7663.

All correspondence with CDAQ must include the Ohio EPA facility identification number for Springco Metal Coating: 13-18-00-5888.

Sincerely,

A handwritten signature in cursive script, appearing to read "George Baker".

George Baker
Chief of Enforcement, CDAQ

GB/BS |K

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005888\2009-6-16 RCAP.docx



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue Plaza, Suite 200
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 : 7003 1010 0004 2923 5885
RETURN RECEIPT REQUESTED**

May 4, 2010

Mr. Robert Wolf
Springco Metal Coating
12500 Elmwood Avenue
Cleveland, Ohio 44111

**FACILITY ID: 13-18-00-5888
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Robert Wolf:

On October 15, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Receipt of Corrective Action Plan requiring Springco Metal Coating to submit:

1. 3rd quarter deviation reports for Emission Units (EUs) K001, N002, N003, and N005.
2. An annual VOC emission report for EU K001.
3. A maintenance plan showing EUs N002, N003, and N005 were serviced by a qualified incinerator contractor, and thereafter, every 6 months.

CDAQ received the 3rd quarter deviation reports for EUs K001, N002, N003, and N005, on October 19, 2009; the 2009 annual VOC emission report for EU K001 on April 30, 2010; and a maintenance plan showing EUs N002, N003, and N005 were serviced by a qualified incinerator contractor on September 14, 2009.

The corrective action plan was received and 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Springco Metal Coating: 13-18-00-5888.

Sincerely,

Linda Kimmey for G.B.
George Baker
Chief of Enforcement



GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005888\2009-6-16 NEAR.docx

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager *Robert Wolf*
Signature
Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH
44111

Date: 4-28-10

Facility ID: 13 18 00 5888

Emission Unit: K001

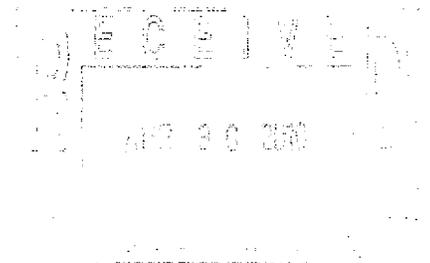
RE: Annual Report for 2009
Year

Springco Metal Coating's permit requires:

The permittee shall submit to the Cleveland BAPC an annual emissions report including the VOC emissions for the coating line. This report shall be submitted no later than the end of the first quarter following the previous calendar year.

Emissions for the Emissions Unit K001, the electrodeposition coating line for 2009 were 2.39 TONS.

This is for the black e-coat (F590-534)



TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erieview Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager Robert Wolf
Signature
Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH
44111

Date: 1-28-10

Facility ID: 13 18 00 5888

Emission Unit: K001

RE: Annual Report for 2009
Year

Springco Metal Coating's permit requires:

The permittee shall submit to the Cleveland BAPC an annual emissions report including the VOC emissions for the coating line. This report shall be submitted no later than the end of the first quarter following the previous calendar year.

Emissions for the Emissions Unit K001, the electrodeposition coating line for 2009 were .0108 tons

THIS IS for the Grey Resin CR691B

RECEIVED
APR 30 2010

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erieview Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager *Robert Wolf*
Signature
Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH
44111

Date: 4-28-10

Facility ID: 13 18 00 5888

Emission Unit: K001

RE: Annual Report for 2009
Year

Springco Metal Coating's permit requires:

The permittee shall submit to the Cleveland BAPC an annual emissions report including the VOC emissions for the coating line. This report shall be submitted no later than the end of the first quarter following the previous calendar year.

Emissions for the Emissions Unit K001, the electrodeposition coating line for 2009 were

.427

This is for the Grey Paste CP611

RECEIVED
APR 30 2010

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager

Robert E Wolf
Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

FEB 10 2010

Date:

Jan 28, 2010

Facility ID: 13 18 00 5888

RE:

Quarterly Report for 1st 2nd 3rd

4th

2009

Year

There were no deviations during this quarter.

C The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

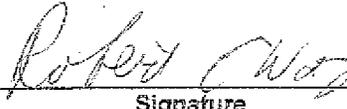
- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Days it was cleaned out Sept. 12, 2009	N002	C	requested process change for all Burners
Oct. 10, 2009	N002	C	
Nov. 17, 2009	N002	C	
Dec. 12, 2009	N002	C	
Sept 12, 2009	N003	C	
Oct. 10, 2009	N003	C	
Nov. 17, 2009	N003	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erieview Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager



Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date:

Jan 28, 2010

Facility ID: 13 18 00 5888

RE:

Quarterly Report for 1st 2nd 3rd

4th

2009

Year

There were no deviations during this quarter.

The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Dec. 12, 2009	N003	C	
Sept 12, 2009	N005	C	
Oct. 19, 2009	N005	C	
Nov. 14, 2009	N005	C	
Dec. 12, 2009	N005	C	
Sept 12, 2009	N006	C	
Oct. 17, 2009	N004	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager Robert F. Wolf
Signature
Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: Jan. 28, 2010

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

_____ There were no deviations during this quarter.

_____ The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- a. All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- b. All batches in which more than 20 lb of salvageable materials was charged per hour; and
- c. All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Nov. 21, 2009	N006	C	
Dec. 19, 2009	N006	C	
Sept 19, 2009	N007	C	
Oct. 17, 2009	N007	C	
Nov. 21, 2009	N007	C	
Dec 19, 2009	N007	C	
Sept 19, 2009	N008	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager

Robert G Wolf
Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: Jan. 28, 2010

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

There were no deviations during this quarter.

The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- a. All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- b. All batches in which more than 20 lb of salvageable materials was charged per hour; and
- c. All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Oct. 17, 2009	N008	C	
Nov. 21, 2009	N008	C	
Dec. 19, 2009	N008	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager

Robert E Wolf
Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: 10-19-09

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

There were no deviations during this quarter.

C

The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Days it were cleaned out May 2, 2009	N002	C	requested process changed for all
June 6, 2009	N002	C	Burners.
July 11, 2009	N002	C	
Aug 1, 2009	N002	C	
May 2, 2009	N003	C	
June 6, 2009	N003	C	
July 11, 2009	N003	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erievue Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager


Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: 10-19-09

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

_____ There were no deviations during this quarter.

C The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
Days it were Cleaned out Aug 1, 2009	N003	C	
May 2, 2009	N005	C	
June 6, 2009	N005	C	
July 11, 2009	N005	C	
Aug 1, 2009	N005	C	
May 2, 2009	N006	C	
June 6, 2009	N006	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erieview Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager



Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: 10-19-2009

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

There were no deviations during this quarter.

C

The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation Days it were cleaned out	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
July 11, 2009	N006	C	
Aug 1, 2009	N006	C	
May 2, 2009	N007	C	
June 6, 2009	N007	C	
July 11, 2009	N007	C	
Aug 1, 2009	N007	C	
May 2, 2009	N008	C	

TO: Cleveland Dept. of Public Health, Division of Air Quality
75 Erieview Plaza, 2nd Floor, Cleveland, OH 44114

ATT: Mr. Bryan Sokolowski

FROM: Bob Wolf, Plant Manager



Signature

Springco Metal Coatings, 12500 Elmwood Ave., Cleveland, OH 44111

Date: 10-19-2009

Facility ID: 13 18 00 5888

RE: Quarterly Report for 1st 2nd 3rd 4th 2009
Year

There were no deviations during this quarter.

C

The following deviations occurred during this quarter:

Springco Metal Coating is required to report the following deviations:

- All times when the temperature of the exhaust gases from the secondary chamber was less than 1500 degrees F;
- All batches in which more than 20 lb of salvageable materials was charged per hour; and
- All days in which the ashes were not removed from the primary chamber.

Date of deviation Days it were cleaned out	Emission Unit (N002, N003, N005, N006, N007, or N008)	Deviation a, b, or c (see list above)	Corrective Action Taken by Springco Metal Coatings
June 16, 2009	N008	C	
July 11, 2009	N008	C	
Aug 1, 2009	N008	C	

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each **NOV** document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * *
County	County	 * C O U N T Y A H O G A *
ID info	1318004181	 * 1 3 1 8 0 0 4 1 8 1 *
Name		 * C I T Y O F C L E V E L A N D H O P K I N S I N T E R N A T I O N A L A I R P O R T R O C K Y R I V E R * S I T Y E *
Date:	4/9/2010	 * 4 / 9 / 2 0 1 0 *
Record ID	CDAQ_1112 1	 * C D A Q 1 1 1 2 1 *



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 : 7003 1010 0004 2923 5878
RETURN RECEIPT REQUESTED

April 9, 2010

Ricky D. Smith
Cleveland Airport Systems
5300 Riverside Drive
P.O. Box 81009
Cleveland, Ohio 44181-0009

NON-HPV

FACILITY ID: 13-18-00-4181

NOTICE OF VIOLATION: Failure to submit a Permit-to-Operate (PTO) Renewal Application for Emission Unit (EU) N001, failure to submit a permit application for (4) emergency electrical generators, and failure to obtain all 2006-2009 city permits-to-operate

Dear Mr. Ricky Smith:

On March 4, 2010, the Cleveland Division of Air Quality (CDAQ) inspected Cleveland Hopkins International Airport (CHA) located at 5300 Riverside Drive 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.

CHA failed to submit a PTO renewal application for Emission N001: Kelley Incinerator, which is in violation of Ohio Administrative Code (OAC) Rule 3745-31-02 (A)(1), and Ohio Revised Code (ORC) Section 3704.05 (C).

CHA's operation of four emergency electrical generators is in violation of OAC Rule 3745-31-02 (A)(1), and Ohio Revised Code (ORC) 3704.05 (F) and (G), for operating an emission source without first applying for and obtaining a Permit-to-Install/Operate (PTIO) or by not submitting a Permit by Rule (PBR) notification form.

In addition, CHA is in violation of the City of Cleveland's Codified Ordinance Chapters 259.01, and 263.01 for failing to obtain all 2006-2009 city permits-to-operate by submitting city permit fees.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that CHA submit a Permit to Install/Operate (PTIO) application and Emission Activity Category Form



In addition CDAQ requests CHA submit either a PTIO application or a PBR notification form for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators within thirty (30) days of your receipt of this letter to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that CHA obtain all 2006-2009 city permits-to-operate by submitting city permit fees within thirty (30) days of receipt of this letter to the following address:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

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

The appropriate permit application(s) and supplemental form(s) can be found at:

<http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>

<http://www.epa.ohio.gov/dapc/pbr/permitbyrule.aspx>

Please note that all permit applications and PBR notification forms submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cleveland Hopkins International Airport: 13-18-00-4181.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Kim McGreal, Environmental Service Manager
Facility File and L:\Data\Facilities\1318004181\2010-3-4 NOV.docx

encl: 2006-2009 City Fee Invoices



CLE CLEVELAND HOPKINS
INTERNATIONAL AIRPORT

BKL CLEVELAND BURKE
LAKEFRONT AIRPORT

June 2, 2010

Bryan Sokolowski
Environmental Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio, 44114

RECEIVED

JUN - 8 2010

RE: Timeframe to Correct Alleged Violations
Facility ID: 13-18-00-4181

Dear Mr. Sokolowski:

On March 4, 2010, the Cleveland Division of Air Quality (CDAQ) was on-site to complete an inspection at Cleveland Hopkins International Airport (CLE) for our boilers, emergency generators, gas dispensing and the incinerator. CDAQ advised our Environmental Services section that they needed to update their files of any air contaminant sources at CLE, and was escorted by representatives from Environmental Services and the Electrical Division throughout the Airport facilities. Although several of the operating sources presently on-site were installed and permitted correctly over the past decade, the below mentioned new installations have been determined by CDAQ to be operating in violation of air statues, regulations and/or air permitting conditions:

1. One (1) Incinerator: Failure to submit a Permit-to-Operate (PTO) Renewal Application for Emission Unit (EU) N001
2. Four (4) recently-installed Electrical Generators: Failure to submit a permit application
3. Several additional units or installations: Failure to obtain all 2006-2009 City Permits-to-Operate

Corrective actions have been identified and will commence with the current cumulative Notice of Violation, so that compliance can be obtained for Ohio Administrative Code (OAC) 3745-31 Permit-to Install New sources and Permit-to-Install and Operate Program and Ohio Revised Code (ORC) 3704 Air Pollution Control, as well as City of Cleveland Codified Ordinance Chapters 259.01 and

Cleveland Hopkins International Airport
5300 Riverside Drive
P.O. Box 81009
Cleveland, OH 44181-0009
USA
1 216 265 6800

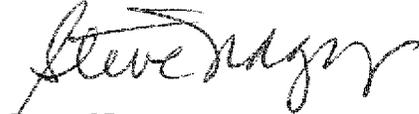
Cleveland Burke Lakefront Airport
1501 North Marginal Road
Cleveland, OH 44114-3759
1 216 781 6411

263.01 for failing to obtain all 2006-09 city permits-to-operate by not submitting city permit fees. Department of Port Control is currently in progress of completing the abovementioned corrective actions; however request a time extension past the 30 day response timeframe. The timeline for the corrective actions is proposed in the table below.

Corrective Actions	Proposed timeline
Complete a Permit to Operate (PTO) renewal for the Incinerator	June 30, 2010
Complete PTIOs (or Permit by Rule) for four (4) new emergency generators	June 30, 2010
Process payment for the retroactive amount for the 2006-2009 PTOs (total of \$4,087.50)	June 23, 2010

In advance, thank you for your cooperation.

Sincerely,



Steve Nagy
Chief of Planning and Engineering

SN/km

Cc: Ricky D. Smith, Director of Airports
Fred Szabo, Commissioner
Kim McGreal, Environmental Services Manager



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 : 7009 3410 0002 1933 8264
RETURN RECEIPT REQUESTED

June 10, 2010

Ricky D. Smith
Cleveland Airport Systems
5300 Riverside Drive
P.O. Box 81009
Cleveland, Ohio 44181-0009

FACILITY ID: 13-18-00-4181

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to submit a permit-to-operate (PTO) renewal application for emission unit (EU) N001, failure to submit a permit application for (4) emergency electrical generators, and failure to obtain all 2006-2009 city permits-to-operate

Dear Mr. Smith:

On April 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Cleveland Airport Systems:

1. Submit a Permit-to-Install/Operate (PTIO) application and Emission Activity Category Form for EU N001.
2. Submit either a PTIO application or a Permit-by-Rule (PBR) notification form for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators.
3. Obtain all 2006-2009 city permits-to-operate by submitting city permit fees.

CDAQ is in receipt of a corrective action plan dated June 2, 2010 in which Cleveland Airport Systems requested an extension of the due dates. You are expected to submit the required PTIO's and PBR notification forms by June 30, 2010, and payment of the 2006-2009 city permit fees by June 23, 2010. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.



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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cleveland Airport Systems: 13-18-00-4181.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement, CDAQ

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Kim McGreal, Environmental Service Manager
Steve Nagy, Chief of Planning and Engineering
Facility File and L:\Data\Facilities\1318004181\2010-3-4 RCAP.docx

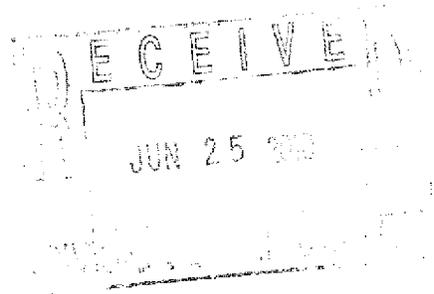


CLE CLEVELAND HOPKINS INTERNATIONAL AIRPORT

BKL CLEVELAND BURKE LAKEFRONT AIRPORT

June 23, 2010

Bryan Sokolowski
Environmental Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio, 44114



**RE: Corrected Alleged Violations
Facility ID: 13-18-00-4181**

Dear Mr. Sokolowski:

On March 4, 2010, the Cleveland Division of Air Quality (CDAQ) was on-site to complete an inspection at Cleveland Hopkins International Airport (CLE) for our boilers, emergency generators, gas dispensing and the incinerator, resulting in a Notice of Violation (received May 4, 2010). Although several of the operating sources presently on-site were installed and permitted correctly over the past decade, the new installations have been determined by CDAQ to be operating in violation of air statutes, regulations and/or air permitting conditions.

Corrective actions have been identified and corrected so that compliance can be obtained for Ohio Administrative Code (OAC) 3745-31-02 (A)(1) and Ohio Revised Code (ORC) Section 3704.05 (C) by completing a Permit to Operate Application for Emission N001: Kelly Incinerator (Appendix A).

Operation of four (4) of our emergency electrical generators have been identified under Ohio Administrative Code (OAC) 3745-31-02 (A)(1) and Ohio Revised Code (ORC) Section 3704.05 (F) and (G) for operating an emission source without first applying for and obtaining a Permit to Install/Operate (PTIO) or by not submitting a Permit by Rule notification form. Attached are four (4) Permit by Rule (PBR) notification forms for the abovementioned violations (Appendix B).

Cleveland Hopkins International Airport
5300 Riverside Drive
P.O. Box 81009
Cleveland, OH 44181-0009
USA
1 216 265 6000

Cleveland Burke Lakefront Airport
1501 North Marginal Road
Cleveland, OH 44114-3759
1 216 781 6411

Also, as requested, attached are Permit by Rule (PBR) notification forms for the remaining seven (7) emergency generators (Z003, Z007-Z001 and Z014) for review and approval (Appendix C).

An email correspondence on Wednesday June 2nd, from Department of Port Control to Cleveland Department of Health stated the acceptance of fund transfers to pay city fees. DPC Accounting Division is completing the paperwork (dept/fund/subfund information) to transfer the retroactive amount of \$4,087.50 for city permits to operate from the years 2006-2009.

In advance, thank you for your cooperation.

Sincerely,



Ricky D. Smith
Director of Airports

RDS/km

Enclosures

Cc: Fred Szabo, Commissioner
Steve Nagy, Chief of Planning and Engineering
Kim McGreal, Environmental Services Manager

Bryan Sokolowski

From: Kimmy, Linda
Sent: Monday, June 28, 2010 4:24 PM
To: Bryan Sokolowski
Subject: FW: 2006 -2009 Clean Air Permits to Operate

-----Original Message-----

From: Hoislbauer, Nancy
Sent: Monday, June 28, 2010 4:22 PM
To: Emery, Annette; Krzywicki, Mike
Cc: Harry, Valarie; Osborne, Rhonda; Kimmy, Linda; Stiggers, Vakedia; McGreal, Kim
Subject: RE: 2006 -2009 Clean Air Permits to Operate

Hi Annette,

Per your information below, I processed IET - 5007- GASB2010000014- today in the amount of \$4,087.50.

Nancy Hoislbauer
Budget Administrator
City of Cleveland - Department Public Health Division of Air Quality
75 Erieview Plaza 2nd floor
Cleveland, OH 44114-1839
nhoislbauer@city.cleveland.oh.us
Phone 216-664-4181
Fax 216-420-8047

From: Emery, Annette
Sent: Wednesday, June 09, 2010 12:50 PM
To: Kimmy, Linda; Stiggers, Vakedia
Cc: Harry, Valarie; Osborne, Rhonda; McGreal, Kim
Subject: 2006 -2009 Clean Air Permits to Operate

Good Afternoon Linda,

Attached are the approved invoices for 2006, 2007, 2008, & 2009, a total amount of \$4087.50.

If I understand correctly, the billing department is required to do the Internal Expense Transfer (IET)

CAS coding is: FUND 60 SUBFUND 001 DEPT 3001 UNIT 00 APPR UNIT 640 OBJECT 6455

Please call me with any questions at 216 898-5174.

Annette L. Emery
Cleveland Airport Systems
Department of Port control
Airport Finance
Accountant IV
Ph: 216 898-5174 *--o--(1)--o--*
FX: 216 265-6069
AEmery@clevelandairport.com



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 : 7009 3410 0002 1934 0335
RETURN RECEIPT REQUESTED**

July 19, 2010

Ricky D. Smith
Cleveland Airport Systems
5300 Riverside Drive
P.O. Box 81009
Cleveland, Ohio 44181-0009

FACILITY ID: 13-18-00-4181

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to submit a permit-to-operate (PTO) renewal application for emission unit (EU) N001, failure to submit a permit application for (4) emergency electrical generators, and failure to obtain all 2006-2009 city permits-to-operate

Dear Mr. Smith:

On April 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of violation requesting that Cleveland Airport Systems:

1. Submit a Permit-to-Install/Operate (PTIO) application and Emission Activity Category Form for EU N001.
2. Submit either a PTIO application or a Permit-by-Rule (PBR) notification form for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators.
3. Obtain all 2006-2009 city permits-to-operate by submitting city permit fees.

CDAQ is in receipt of:

1. PBR notifications for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators (June 25, 2010).
2. Payment of 2006-2009 city permit fees (June 28, 2010).

CDAQ received a PTIO application for EU N001 on June 25, 2010. The application was preliminarily reviewed by Permitting Specialist Larry Maline. Mr. Maline determined that the application was incomplete, and the application was returned, on July 1, 2010. You are expected to submit a complete PTIO application for EU N001 within fourteen (14) days of your receipt of this letter to the following address:



Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cleveland Airport Systems: 13-18-00-4181.

Sincerely,

Linda Kimmey for G.B.

George Baker
Chief of Enforcement, CDAQ

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Kim McCreal, Environmental Services Manager
Facility File and L:\Data\Facilities\1318004181\2010-3-4-RCAP-2.docx



CLE CLEVELAND HOPKINS
INTERNATIONAL AIRPORT

BKL CLEVELAND BURKE
LAKEFRONT AIRPORT

August 19, 2010

Bryan Sokolowski
Environmental Enforcement Specialist I
Cleveland Department of Public Health
Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio, 44114

RE: Timeframe to Complete Incinerator PTIO Application
Facility ID: 13-18-00-4181

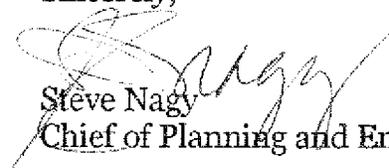
Dear Mr. Sokolowski:

On April 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) to the Cleveland Hopkins International Airport (CLE) requesting a Permit-to-Install/Permit-to-Operate (PTIO) Renewal Application for Emission Unit (EU) N001, Permit By Rule (PBRs) for EU's Z003, Z007-Z011 and Z014 and four (4) non-permitted recently-installed emergency electrical generators and 2006-2009 city permit fees.

CDAQ has been in receipt of the PBR notifications (June 25, 2010) as well as payment for the 2006-2009 city permit fees (June 28, 2010). The PTIO application that was sent for N001 was incomplete and sent back to Department of Port Control requesting more information. Department of Port Control is currently in progress of completing the abovementioned corrective actions for the additional requested information for our incinerator; however request a time extension past the 14 day response timeframe. The complete PTIO for our N001 Incinerator will be sent to CDAQ on or before August 31, 2010.

In advance, thank you for your cooperation.

Sincerely,


Steve Nagy
Chief of Planning and Engineering

Cleveland Hopkins International Airport
5300 Riverside Drive
P.O. Box 81009
Cleveland, OH 44181-0009
USA
1 216 265 6000

Cleveland Burke Lakefront Airport
1501 North Marginal Road
Cleveland, OH 44114-3759
1 216 781 6411

SN/km

cc: Ricky D. Smith, Director of Airports
Fred Szabo, Commissioner
Kim McGreal, Environmental Services Manager



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.civclevelandhealth.org

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

**CERTIFIED MAIL: 7003 1010 0004 2923 4291
RETURN RECEIPT REQUESTED**

September 8, 2010

Ricky D. Smith
Cleveland Airport Systems
5300 Riverside Drive
P.O. Box 81009
Cleveland, Ohio 44181-0009

**FACILITY ID: 13-18-00-4181
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Smith:

On April 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Cleveland Airport Systems to:

1. Submit a Permit-to-Install/Operate (PTIO) application and Emission Activity Category (EAC) Form for Emission Unit (EU) N001.
2. Submit either a PTIO application or a Permit-by-Rule (PBR) notification form for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators.
3. Obtain all 2006-2009 city permits-to-operate by submitting city permit fees.

CDAQ is in receipt of:

1. PBR notifications for EU's Z003, Z007-Z011, Z014, and the four non-permitted emergency electrical generators (June 25, 2010).
2. Payment of 2006-2009 city permit fees (June 28, 2010).
3. PTIO application and EAC Form for EU N001 (September 2, 2010).

The corrective action plan was received and 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cleveland Airport Systems: 13-18-00-4181.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Kim McGreal, Cleveland Airport Systems

Facility File and L:\Data\Facilities\1318004181\2010-3-4 NEAR.docx

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each **NOV** document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * *
County	County	 * C O U N T Y *
ID info	1318004330	 * 1 3 1 8 0 0 4 3 3 0 *
Name		 * V A R E D I C A L C E N T E R *
Date:	3/5/2009	 * 3 / 5 / 2 0 0 9 *
Record ID	CDAQ_10219	 * C D A Q 1 0 2 1 9 *



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 #70022030000118087926
RETURN RECEIPT REQUESTED**

May 25, 2009

Dave Sabol
V.A. Medical Center
10701 East Boulevard
Cleveland, OH
44106

**FACILITY ID: 13-18-00-4330
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Dave Sabol:

On April 6, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Receipt of Corrective Action Plan granting V.A. Medical Center (V.A.) an extension until April 20, 2009 to submit Permit-by-Rule notifications for four emergency generators, grab samples for fuel oil deliveries for emission units B004-B006 and pay city permit fees for 2006, 2007 and 2008. CDAQ is in receipt of the Permit-by-Rule notifications dated April 30, 2009 and city permit payment dated May 6, 2009. However, V. A. Medical Center is required to submit grab samples for fuel oil deliveries in the next quarterly deviation report.

The corrective action plan was received and 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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for V.A. Medical Center: 13-18-00-4330.

Sincerely,

Valencia White, MPH
Field Enforcement Manager, CDAQ

VW/ak

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318004330\2009-2-19 NEAR.doc



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
10701 East Boulevard
Cleveland OH 44106

April 10, 2009

In Reply Refer To: 541

Cleveland Local Air Agency
1925 St. Clair Avenue NE
Cleveland, Ohio 44114

Re: January thru March Quarterly Report for (VA Medical Center) 1318004330

Dear Sir or Madame:

The VA Medical Center is submitting this report in compliance with PTI 13-03071 for the 10701 East Blvd facility.

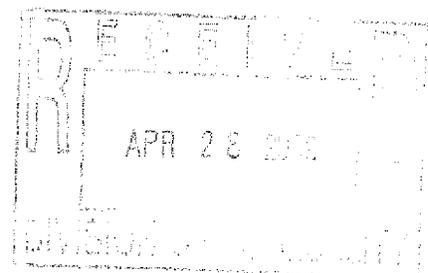
No deviations from the permit occurred the January- March 2009 quarter.

Date	Total Fuel
Jan thru Mar	00.00

If there are any questions regarding the above, please contact Bill Jamieson at (216) 791-3800 ext. 4177.

Sincerely,

William Jamieson
Boiler Plant Supervisor





**PETROLEUM
TRADERS
CORPORATION**

7120 Pointe Inverness Way
Fort Wayne, IN 46804-7928
(260) 432-6622

04/07/2009

Cleveland VA Medical Center
Cleveland, OH
ATTN: William Jamieson
PH: 440-242-9333 or 216-701-6549
FAX: 216-231-3251

RE: Contract SPO600-05-D-4060 Item H38-70

Petroleum Traders Corporation did not delivery any fuel to this location under Item Number H38-70 for No2 High Sulfur Heating fuel for the months of January, February, or March of 2009.

Respectfully,

Gayle Newton
Contract Sales Manager



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 #70022030000118089142
RETURN RECEIPT REQUESTED

April 6, 2009

David Sabol
Chief, Engineering Service
V.A. Medical Center
10701 East Boulevard
Cleveland, OH
44106

HPF
NON-HPV
FACILITY ID: 13-18-00-4330
RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION

Dear Mr. David Sabol:

On March 5, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that V.A. Medical Center submit a corrective action plan regarding the following violations: failing to pay city permit fees, operating emission units without proper permits and failing to comply with terms and conditions of issued permits. CDAQ is in receipt of a corrective action plan dated March 30, 2009, stating that you will comply with payment of 2006, 2007 and 2008 city permit fees, submit permit by rule notifications for each generator and documentation stating use of proper testing methods, which comply with permit terms and conditions, for all future fuel deliveries by April 20, 2009. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for V.A. Medical Center: 13-18-00-4330.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White
Field Enforcement Manager, CDAQ



VW/ak

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318004330\2009-4-3 RCAP.doc



**Louis Stokes
Cleveland Department of
Veterans Affairs Medical Center
10000 Brecksville Road
Brecksville, OH 44141**

In Reply Refer To: 541/138(B)

March 24, 2009

City of Cleveland
Division of Air Quality
Attn: Andrew Kenney
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839



Dear Mr. Kenney:

The Louis Stokes Cleveland VA Medical Center is submitting its corrective action plan for the Notice of Violation notification received March 16, 2009 based on the February 19, 2009 CDAQ inspection at the Wade Park facility (Ohio EPA ID# 13-18-00-4330).

In order to deliver quality healthcare to our nation's veterans, we recognize that the need to operate so as to protect both the environment and the health and safety of patients, employees and visitors. Please review the following corrective action plan we are implementing with respect to the violations identified during your visit.

FINDING	REPORT RECOMMENDATIONS	ACTION STEPS	ESTIMATED COMPLETION DATE
1. IAW OACR 3745-31-03(A)(4)(b) and ORC section 3704.05(F) the VAMC Cleveland is in violation for failing to submit permit-by-rule notifications for the four emergency generators.	Submit a permit-by-rule notification form for each generator.	The Green Environmental Management System (GEMS) Coordinator will complete and submit the permit-by-rule notification forms for each generator.	April 20, 2009
2. IAW ORC section 3704.06(C), the VAMC Cleveland is in violation for failing to comply with Permit-to-Operate (PTO)	The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is	The three tanks which supply the boilers were installed in 2007 and filled in 2008. Only one fuel oil delivery has been	April 20, 2009

<p>terms and conditions for emission units B004, B005, and B006. The quarterly reports submitted for fuel oil grab samples indicated that the method used for sulfur and heat content analysis did not meet the specifications with ASTM methods outlined in the PTO and the method used was not approved by the CDAQ.</p>	<p>received for burning in the emissions units for the analysis of sulfur content IAW ASTM methods D4294, D240, or 6010 and IAW ASTM D240 for heat content. Alternative, equivalent methods may be used upon written approval from the CDAQ.</p>	<p>made since then, as we have not burned fuel oil in the boilers since the new tanks were installed and filled. No samples were analyzed for this initial delivery. Will review vendor's (Petroleum Traders) contract to ensure the proper methods are incorporated IAW the permit terms and conditions for future deliveries, or consult with another source, NALCO, for testing. As an initiative to implementing EO 13423, the GEMS Coordinator suggests we begin using ultra low sulfur fuel oil in the future and ensure it is the adequate grade upon delivery.</p>	
<p>3. IAW the Cleveland Codified Ordinance Chapter 263.01 the VAMC Cleveland is in violation for failing to pay city permit fees for 2006, 2007, and 2008 on emission units B004, B005, and B006 (Boilers)</p>	<p>Pay for 2006, 2007 and 2008 City Permit fees (\$3237.50)</p>	<p>Submitted fee invoices to the Facilities Manager on March 16, 2009 to process through acquisition management.</p>	<p>April 20, 2009</p>
<p>4. IAW the Cleveland Codified Ordinance Chapter 263.01 the VAMC Cleveland is in violation for failing to pay city permit fees for the six diesel storage tanks since their installation in 2007, three emergency generators two of which were installed in 2007 and one installed in 2008.</p>			

If you have any questions or require additional information, please contact me at 440-526-3030, ext. 6162.

Sincerely,

A handwritten signature in black ink, consisting of several large, overlapping loops and curves, characteristic of a cursive or stylized signature.

DAVID SABOL
Chief, Engineering Service



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 # 70020510000224276419
RETURN RECEIPT REQUESTED

March 5, 2009,

Dave Sabol
V.A. Medical Center
10701 East Boulevard
Cleveland, OH
44106

NON-HPV

FACILITY ID: 13-18-00-4330

NOTICE OF VIOLATION : FAILURE TO PAY CITY FEES, OPERATING EMISSION UNITS WITHOUT PROPER PERMITS AND FAILURE TO COMPLY WITH TERMS AND CONDITIONS OF ISSUED PERMITS

Dear Mr. Dave Sabol:

On February 19, 2009, the Cleveland Division of Air Quality (CDAQ) inspected V.A. Medical Center located at 10701 East Blvd 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.

V.A. Medical Center's operation of four emergency generators, including three diesel generators located in generator room and one natural gas generator located beside the liquid oxygen tanks, are in violation of Ohio Administrative Code Rule 3745-31-03(A)(4)(b) and Ohio Revised Code Section 3704.05(F) for failing to submit permit-by-rule notifications. V.A. Medical Center has been in violation since installing the natural gas generator in 1999 and since the installation of two of the three diesel generators in 2007 and the third diesel generator in 2008,

V.A. Medical Center is also in violation of Ohio Revised Code Section 3704.06(C) for failing to comply with Permit-to-Operate (PTO) terms and conditions for emission units B004, B005 and B006. The PTO for B004, B005 and B006, in Part II(C)(2) provides the following:

"The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in



accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Cleveland Division of Air Quality”

Quarterly reports submitted by V.A. Medical Center state that #2 fuel oil deliveries comply with ASTM 396 specifications. This specification does not meet with the ASTM methods outlined in the permit and V.A. Medical Center has not received written approval from CDAQ for any alternative methods.

V.A. Medical Center is also in violation of the Cleveland Codified Ordinance Chapter 263.01 for failing to pay city permit fees for 2006, 2007 and 2008 on emission units B004, B005 and B006. V.A. Medical Center has also failed to pay city permit fees for six diesel storage tanks with a capacity greater than or equal to 20,000 gallons since their installation in 2007, and three diesel emergency generators two of which were installed in 2007 and one installed in 2008.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that V.A. Medical Center submit Permit-by-Rule notification forms (see enclosure) for the four emergency generators, pay for 2006, 2007 and 2008 City Permit fees (invoices enclosed) and submit a corrective action plan for emission units B004-B006 ASTM methods to the following enforcement representative:

Andrew Kenney
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for V.A. Medical Center: 13-18-00-4330.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

VW/ak

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\1318004330\2009-2-19 NOV.doc

encl: Permit by Rule Notification Forms and City Permit Fee Invoices

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each NOV document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * *
County	County	 * C O U N T Y * H O G A *
ID info	1318005421	 * 1 3 1 8 0 0 5 4 2 1 *
Name		 * P R E M I E R M A N U F A C T U R I N G C O R P O R A T I O N *
Date:	9/28/2009	 * 9 / 2 8 / 2 0 0 9 *
Record ID	CDAQ_1026 6	 * C D A Q 1 0 2 6 6 *



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 #70022030000118088091
RETURN RECEIPT REQUESTED

September 28, 2009

Mr. Rich Guzik
Premier Manufacturing Corporation
12117 Bennington Avenue
Cleveland, OH 44135

NON-HPV

FACILITY ID: 13-18-00-5421

NOTICE OF VIOLATION: Failing to Submit a Permit-to-Install/Operate (PTIO) for a new emission unit.

Dear Mr. Guzik:

On August 27, 2009, and September 9, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Premier Manufacturing Corporation located at 12117 Bennington Avenue 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.

Premier Manufacturing Corporation's operation of PVC Bake-off Oven is in violation of Ohio Revised Code 3704.05(F) and Ohio Administrative Code 3745-31-02(A)(1) for failing to submit a permit-to-install/operate (PTIO) application since September 2007.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Premier Manufacturing Corporation submit a PTIO application for the PVC Bake-off Oven to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

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.



The appropriate permit application(s) and supplemental form(s) can be found at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, 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 Andrew Kenney at (216) 420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Premier Manufacturing Corporation: 13-18-00-5421.

Sincerely,

George Baker
Chief of Enforcement

GB/ak

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\1318005421\2009-8-27 NOV.doc



Premier manufacturing corporation

December 9, 2009

Mr. Andrew Kenny
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

Dear Mr. Kenny,

Please find enclosed, an application packet for the use of a burn-off oven at Premier Manufacturing Corporation located at 12117 Bennington Avenue, Cleveland, Ohio 44135.

The application packet includes:

1. General information, page 1 and 2
2. Description with calculations
3. Section I, pages 1-3
4. Section II, pages 1-10
5. EAC form 3102 for the oven. We will not be incinerating waste materials. The burn-off oven will be used to clean PVC coated hooks for our coating line.

Mrs. Adrienne LaFavre, Ohio EPA, Office of Compliance Assistance, was also very helpful with her immeasurable knowledge and explanation of the regulations.

Thank you for your patience and assistance to complete this process. Please let me know if there is any further information you may require. Contact me at telephone number (216) 941-9700 or e-mail rguzik@premiermfg.com.

Sincerely,

PREMIER MANUFACTURING CORPORATION

Richard B. Guzik

Richard B. Guzik
Maintenance Manager

CLEVELAND • CORPORATE OFFICE

12117 Bennington Avenue, Cleveland OH 44135 • (216) 941-9700 • Fax: (216) 941-9719



**Application for Permit to Install (PTI)
and Permit to Install/Operate (PTIO)**

Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

For EPA Use Only

Application Number _____
Date Received _____

Facility Information

Note: Application is incomplete if all **bolded** questions throughout the application are not completed.

Legal Facility Name PREMIER MANUFACTURING CORPORATION

Alternate Name (if any) _____

Facility Physical Address 12117 BENNINGTON AVENUE

City, ZIP code CLEVELAND 44135

County CUYAHOGA

Facility ID 13-18-00-5421

Facility Description MANUFACTURER OF WELDED WIRE PRODUCTS (FANGUARDS, GRILLES, MOTOR MOUNTS, FORMS)

NAICS Code 332618

Facility Latitude NORTH 41 degrees 25 minutes 35 seconds

Facility Longitude WEST - 81 degrees 46 minutes 24 seconds

Core Place ID (if known) _____

SCSC ID (if known) _____

Portable? Yes No

Portable Type Asphalt Plant Concrete Plant Generator Aggregate Processing Concrete Crusher Grinder Other

Initial Location County _____ If "Other", describe: _____

Contact Information

No change to information on file.

<input checked="" type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
DAVID	BARNARD	(216) 941-9700	(216) 941-9719	dbarnard@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
PREMIER MFG. CORP.	Last Name	(216) 941-9700	(216) 941-9719	www.premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
RICHARD	GOZIK	(216) 941-9700	(216) 941-9719	rguzik@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input checked="" type="checkbox"/> Operator <input type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
PREMIER MFG. CORP.	Last Name	(216) 941-9700	(216) 941-9719	www.premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input checked="" type="checkbox"/> On-Site <input type="checkbox"/> Responsible Official					
RICHARD	GOZIK	(216) 941-9700	(216) 941-9719	rguzik@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

<input type="checkbox"/> Billing <input type="checkbox"/> Owner <input type="checkbox"/> Primary <input type="checkbox"/> Operator <input type="checkbox"/> On-Site <input checked="" type="checkbox"/> Responsible Official					
DONALD C.	DAWSON	(216) 941-9700	(216) 941-9719	dwdawson@premiermfg.com	
12117 BENNINGTON AVENUE	Address 2	CLEVELAND	OHIO	44135	

BENNINGTON AVENUE

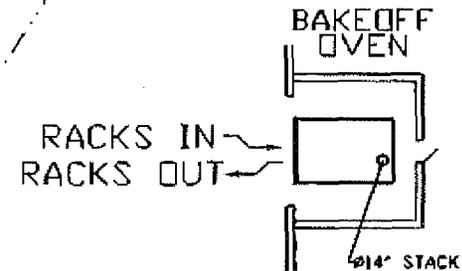
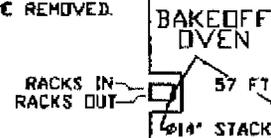
PREMIER MANUFACTURING CORP.
12117 BENNINGTON AVENUE
CLEVELAND, OHIO 44135

FACILITY LATITUDE & LONGITUDE
NORTH 41deg 25min 35sec
WEST -81deg 46min 24sec



PROCESS FLOW DESCRIPTION

- A. METAL HOOKS WITH PVC COATING ARE LOADED ON RACKS AND PLACED IN THE CONTROLLED PYROLYSIS BAKEOFF OVEN.
- B. THE FURNACE IS STARTED.
- C. THE DOORS ARE CLOSED AFTER THE AFTERBURNER LIGHTS.
- D. WHEN THE AFTERBURNER REACHES 1500°, THE MAIN CHAMBER BURNER SLOWLY HEATS THE METAL HOOKS TO 800°, DECOMPOSING THE COATING INTO SMOKE.
- E. SMOKE IS HEATED IN THE OVEN AFTERBURNER CHAMBER TO 1500°-1600°.
- F. EXHAUST GASES AND WATER VAPOR ARE EMITTED THROUGH THE INSULATED STACK.
- G. WHEN THE CLEANING PROCESS IS COMPLETED (BY A TIMER), THE OVEN IS ALLOWED TO COOL AND THE METAL HOOKS ARE REMOVED.



RAILROAD PROPERTY

PLAN VIEW

PREMIER MANUFACTURING CORP. 12117 BENNINGTON AVE CLEVELAND, OHIO 44135			
PROPERTY & BURNOFF OVEN			
DRAWN BY RBG	DATE 11-25-09	PROJECT EPA PERMIT	
REVISION NO. N.A.	ISSUE NO. EPA-11/09	OIL CHANGING PERMIT PERMIT091125	

**Descriptions and Calculations for Premier Manufacturing Corporation
12117 Bennington Avenue, Cleveland, Ohio 44135**

Premier Manufacturing Corporation (Premier) manufactures welded wire products for the heating and air conditioning industry sector. These items include fan guards, grills, motor mounts and wire forms. Activities at Premier include a PVC powder coat line and an electro-zinc plating line.

Some of these parts are powder coated with PVC and then the coated parts undergo curing. The PVC also cures onto the bottom of the wire hooks which hold the parts in the powder coat line. The wire hooks also get coated with PVC which undergoes curing. The cured PVC is cleaned off of the hooks using a burn oven.

The oven now being used was permitted as N002. It has been rebuilt and modified extensively. In a Notice of Violation dated September 29, 2009, from Cleveland Division of Air Quality (CDAQ), Premier was asked to submit a PTIO application considering the present oven as a new unit.

The burn oven is a Pollution Control Products PRC-510. the Primary Chamber (400,000 BTU) and the Secondary Afterburner (520,000 BTU) are natural gas fired. The efficiency is over 99%. The only material burned off in the oven is cured PVC. There is essentially no ash. The dust is swept out each week.

Burn runs last from 5.5 hours to 8 hours. Premier Manufacturing Corp. usually runs one burn 6.5 hr cycle a day, five days a week and 48 weeks a year (1560 hr/yr). The rated capacity is 9.85 lb/hr. This is based on a charge of 64 pounds burned over 6.5 hours.

Pollutants of concern are PM and HCl. The permit for N002, the predecessor of this oven, were 5 ton/yr for HCl and 0.92 for PM. In 2008, 19,412 lbs of resin was cleaned in the oven. This generated 3.6 ton HCl, the pollutant of major concern.

Emissions from Oven (920,000 BTU/hr, 64 lb/charge, 1560, 4000 and 8760 hr/yr)

Particulates from the burn-off

a. From PVC

$$\begin{aligned} &\text{Charge} \quad \text{efficiency} \\ (64 \text{ lb/run}) \quad (0.01) &= 0.64 \text{ lb/run} \\ (0.64 \text{ lb/day}) / 6.5 \text{ hr/run} &= 0.1 \text{ lb/hr} \quad \text{OR} \end{aligned}$$

$$\begin{aligned} &\text{Charge} \quad \text{efficiency} \\ (9.85 \text{ lb/hr}) \quad (0.01) &= 0.1 \text{ lb/hr} \end{aligned}$$

$$\begin{aligned} (0.1 \text{ lb/hr}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) &= 0.44 \text{ ton/yr (PTE at 8760 hr/yr)} \\ (0.1 \text{ lb/hr}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) &= 0.08 \text{ ton/yr (Actual at 1560 hr/yr)} \\ (0.1 \text{ lb/hr}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) &= 0.2 \text{ ton/yr (Requested allowable at 4,000 hr/yr)} \end{aligned}$$

HCl from burn-off

Testing had been done to provide information for previous permit for N002. The files contained the following information.

Thermoclad, the PVC coating, is 58% polyvinyl chloride resin and 56.5% of the resin is chlorine. Therefore, a total of $(0.58) \times (0.565) = 32.8\%$ of the coating converts to HCl.

Testing resulted in the following:

- Run 1 – 18.78 lb HCl divided by 52 lb of coating = 36.11%
- Run 2 – 17.32 lb HCl divided by 50 lb of coating = 34.64%
- Run 3 – 18.14 lb HCl divided by 46 lb of coating = 39.43%

The average % of coating converted to HCl to be used in the calculations is 36.7%.

$$(64 \text{ lb/charge}) (0.367) = 23.5 \text{ lb HCl/day}$$
$$(23.5 \text{ lb HCl}) / (6.5 \text{ hr/day}) = 3.9 \text{ lb/hr}$$

$$(3.9 \text{ lb HCl}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 17.1 \text{ ton/yr (PTE at 8760 hr/yr)}$$
$$(3.9 \text{ lb HCl}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 3.05 \text{ ton/yr (Actual at 1560 hr/yr)}$$
$$(3.9 \text{ lb HCl}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 7.8 \text{ ton/yr (Requested allowable at 4,000 hr/yr)}$$

Emissions from burning a natural gas

Emission factors per AP-42 are in the table below.

Pollutant	Emission factor lb/10 ⁶ scf per AP-42	Emission factors for 0.920 MM BTU/hr*	Emissions for 1560 hr/yr (ton/yr)	Emissions for 4000 hr/yr (ton/yr)	Emissions for 8760 hr/yr (ton/yr)
PM10	7.6	0.007	0.006	0.014	0.03
NOx	100	0.091	0.071	0.181	0.40
CO	84	0.076	0.06	0.16	0.34
SO ₂	0.6	0.0006	0.0005	0.0012	0.0024
VOC	5.5	0.005	0.004	0.010	0.022
Lead	0.0005	0.00000045	0.0000004	0.0000009	0.000002

$$*1 \text{ lb} / 10^6 \text{ scf} / 1020 = 1 \text{ lb} / \text{MMBTU}$$

Total for Particulate

$$\begin{aligned} &\text{Combustion of natural gas} && \text{PVC} \\ &(0.007 \text{ lb/hr}) && + (0.1 \text{ lb/hr}) = 0.1007 \\ &(0.1007 \text{ lb/hr}) (1560 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.08 \text{ ton/yr} \\ &(0.1007 \text{ lb/hr}) (8760 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.44 \text{ ton/yr} \\ &(0.1007 \text{ lb/hr}) (4000 \text{ hr/yr}) / (2000 \text{ lb/ton}) = 0.2 \text{ ton/yr (Requested allowable at 4,000 hr/yr)} \end{aligned}$$



Division of Air Pollution Control
Application for Permit-to-Install or Permit-to-Install and Operate

Section I - General Application Information

This section should be filled out for each permit to install (PTI) or Permit to Install and Operate (PTIO) application. A PTI is required for all air contaminant sources (emissions units) installed or modified after January 1, 1974 that are subject to OAC Chapter 3745-77. A PTIO is required for all air contaminant sources (emissions units) that are not subject to OAC Chapter 3745-77 (Title V). See the application instructions for additional information.

For OEPA use only:	<input type="checkbox"/> Installation	<input type="checkbox"/> Request Federally enforceable restrictions
	<input type="checkbox"/> Modification	<input type="checkbox"/> General Permit
	<input type="checkbox"/> Renewal	<input type="checkbox"/> Other

1. Is the purpose of this application to transition from OAC Chapter 3745-77 (Title V) to OAC Chapter 3745-31 (PTIO)?

- yes no

2. **Establish PER Due Date** - Select an annual Permit Evaluation Report (PER) due date for this facility (does not apply to facilities subject to Title V, OAC Chapter 3745-77). If the PER has previously been established and a change is now desired, a PER Change Request form must be filed instead of selecting a date here.

<u>Due Date:</u>	<u>For Time Period:</u>
<input checked="" type="checkbox"/> February 15	January 1 through December 31
<input type="checkbox"/> May 15	April 1 through March 31
<input type="checkbox"/> August 15	July 1 through June 30
<input type="checkbox"/> November 15	October 1 through September 30

- PER not applicable (Title V) or due date already established
 PER Request Permit Change form attached

3. **Federal Rules Applicability** - Please check all of the appropriate boxes below:

New Source Performance Standards (NSPS)
New Source Performance Standards are listed under 40 CFR 60 - Standards of Performance for New Stationary Sources.

not affected subject to Subpart: _____
 unknown exempt - explain below

National Emission Standards for Hazardous Air Pollutants (NESHAP)
National Emissions Standards for Hazardous Air Pollutants are listed under 40 CFR 61. (These include asbestos, benzene, beryllium, mercury, and vinyl chloride).

not affected subject to Subpart: _____
 unknown subject, but exempt - explain below

Maximum Achievable Control Technology (MACT)
The Maximum Achievable Control Technology standards are listed under 40 CFR 63 and OAC rule 3745-31-28.

not affected subject to Subpart: _____
 unknown subject, but exempt - explain below

Prevention of Significant Deterioration (PSD)
These rules are found under OAC rule 3745-31-10 through OAC rule 3745-31-20.

not affected subject to regulation
 unknown

Non-Attainment New Source Review
These rules are found under OAC rule 3745-31-21 through OAC rule 3745-31-27.

not affected subject to regulation
 unknown

112 (r) - Risk Management Plan
These rules are found under 40 CFR 68.

not affected subject to regulation
 unknown

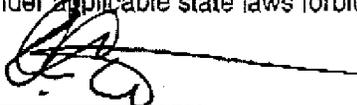
Title IV (Acid Rain Requirements)
These rules are found under 40 CFR 72 and 40 CFR 73.

not affected subject to regulation
 unknown

8. **Authorized Signature** – OAC rule 3745-31-04 states that applications for permits to install or permits to install and operate shall be signed:

- (1) In the case of a corporation, by a principal executive officer of at least the level of vice president, or his duly authorized representative, if such representative is responsible for the overall operation of the facility.
- (2) In the case of a partnership by a general partner.
- (3) In the case of sole proprietorship, by the proprietor, and
- (4) In the case of a municipal, state, federal or other governmental facility, by the principal executive officer, the ranking elected official, or other duly authorized employee.

Under OAC rule 3745-31-04, this signature shall constitute personal affirmation that all statements or assertions of fact made in the application are true and complete, comply fully with applicable state requirements, and shall subject the signatory to liability under applicable state laws forbidding false or misleading statements.



12/9/09

Authorized Signature (for facility)

Date

D.C. DAWSON

VICE PRESIDENT

Print Name

Title

Section II - Specific Air Contaminant Source Information

Facility ID: 13-18-00-5421

Emissions Unit ID: _____

Company Equipment ID: 13002

One copy of this section should be filled out for each air contaminant source (emissions unit) covered by this PTI/PTIO application identified in Section I, Question 5. See the application instructions for additional information.

1. **Air Contaminant Source Installation or Modification Schedule** – Check all that apply (must be completed regardless of date of installation or modification):

New installation (for which construction has not yet begun, in accordance with OAC rule 3745-31-33). When will you begin to install the air contaminant source?

(month/year) _____ **OR** 9 after installation permit has been issued

Initial application for an air contaminant source already installed or under construction. Identify installation date or the date construction began (month/year) JULY, 2007 and the date operation began (month/year) SEPT., 2007

Modification to an existing air contaminant source/facility (for which modification has not yet begun) - List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

REBUILT N002 - FORMERLY PERMITTED UNIT

When will you begin to modify the air contaminant source? (month/year) _____ **OR** 9 after modification permit has been issued

Modification application for an air contaminant source which has been or is currently being modified. List previous PTI or PTIO number(s) for air contaminant sources included in this application, if applicable, and describe the requested modification (attach an additional sheet, if necessary):

Identify modification date or the date modification began (month/year) _____ and the date operation began (month/year) _____

Reconstruction of an existing air contaminant source/facility. Please explain: _____

Renewal of an existing permit-to-operate (PTO) or PTIO
Identify the date operation began after installation or latest modification (month/year) _____

General Permit General Permit Category _____ General Permit Type _____

Complete, sign and attach the appropriate Qualifying Criteria Document

Other, please explain: _____

Section II - Specific Air Contaminant Source Information

Facility ID: 13-16-00-5421

Emissions Unit ID: _____

Company Equipment ID: B002

2. **SCC Codes** - List all Source Classification Code(s) (SCC) that describe the process(es) performed by this air contaminant source (e.g., 1-02-002-04).

40202505

3. **Emissions Information** - The following table requests information needed to determine the applicable requirements and the compliance status of this air contaminant source with those requirements. Suggestions for how to estimate emissions may be found in the instructions to the Emissions Activity Category (EAC) forms required with this application. If you need further assistance, contact your District Office/Local Air Agency representative.

- If total potential emissions of HAPs or any Toxic Air Contaminant (as identified in OAC rule 3745-114-01) are greater than 1 ton/yr, fill in the table for that (those) pollutant(s). For all other pollutants, if "Emissions before controls (max), lb/hr" multiplied by 24 hours/day is greater than 10 lbs/day, fill in the table for that pollutant.
- Actual emissions are calculated including add-on control equipment. If you have no add-on control equipment, "Emissions before controls" will be the same as "Actual emissions".
- Actual emissions and Requested Allowable should be based on operating 8760 hr/yr unless you are requesting federally enforceable operating restrictions to limit emissions. If so, calculate emissions based on requested operating restrictions and describe in your calculations.
- If you use units other than lbs/hr or ton/yr, specify the units used (e.g., gr/dscf, lb/ton charged, lb/MMBtu, tons/12-months).
- Requested Allowable (ton/yr) is often equivalent to Potential to Emit (PTE) as defined in OAC rule 3745-31-01 and OAC rule 3745-77-01.

Pollutant	Emissions before controls (max)* (lb/hr)	Actual emissions* (lb/hr)	Actual emissions* (ton/year)	Requested Allowable* (lb/hr)	Requested Allowable* (ton/year)
Particulate emissions (PE/PM) (formerly particulate matter, PM)	0.1007	0.1007	0.08	0.1007	0.2
PM # 10 microns in diameter (PE/PM ₁₀)					
PM # 2.5 microns in diameter (PE/PM _{2.5})					
Sulfur dioxide (SO ₂)	0.0006	0.0006	0.0005	0.0006	0.0012
Nitrogen oxides (NO _x)	0.091	0.091	0.071	0.091	0.182
Carbon monoxide (CO)	0.076	0.076	0.06	0.076	0.16
Organic compounds (OC)	0.005	0.005	0.004	0.005	0.10
Volatile organic compounds (VOC)	0.005	0.005	0.004	0.005	0.10
Lead (Pb)	0.00000045	0.00000045	0.0000004	0.00000045	0.0000009
Total Hazardous Air Pollutants (HAPs)	3.9	3.9	3.05	3.9	7.8
Highest single HAP: HCl	3.9	3.9	3.05	3.9	7.8
Toxic Air Contaminants (see Instructions):					

* Provide your calculations as an attachment and explain how all process variables and emission factors were selected. Note the emission factor(s) employed and document origin. Example: AP-42, Table 4.4-3 (8/97); stack test, Method 5, 4/96; mass balance based on MSDS; etc.

PLEASE SEE ADDITIONAL SHEETS WITH FACILITY DESCRIPTION

4. **Best Available Technology (BAT)** - For each pollutant for which the Requested Allowable in the above table exceeds 10 tons per year, BAT, as defined in OAC 3745-31-01, is required. Describe what has been selected as BAT and the basis for the selection:

SECONDARY AFTERBURNER

5. **Control Equipment** - Does this air contaminant source employ emissions control equipment?

- Yes - fill out the applicable information below.
 No - proceed to Question 6.

Section II - Specific Air Contaminant Source Information

Facility ID: 13-18-00-5421

Emissions Unit ID: _____

Company Equipment ID: B002

Wet Scrubber
 Manufacturer: _____ Year installed: _____ Your ID for control equipment _____

Describe this control equipment:

Pollutant(s) controlled: PE/PM PE/PM₁₀ PE/PM_{2.5} OC VOC
 SO₂ NO_x CO Pb Other _____

Estimated capture efficiency (%): _____ Basis for efficiency: _____

Design control efficiency (%): _____ Basis for efficiency: _____

Operating control efficiency (%): _____ Basis for efficiency: _____

Operating pressure drop range (inches of water): Minimum: _____ Maximum: _____

Type: Impingement Packed bed Spray chamber Venturi Other: _____

pH range for scrubbing liquid: Minimum: _____ Maximum: _____

Is scrubber liquid recirculated? Yes No

Scrubber liquid flow rate (gal/min): _____

Scrubber liquid supply pressure (psig): _____ NOTE: This item for spray chambers only.

Inlet gas flow rate (acfm): _____ Outlet gas flow rate (acfm): _____

Inlet gas temperature (°F): _____ Outlet gas temperature (°F): _____

This is the only control equipment on this air contaminant source

If not, this control equipment is: Primary Secondary Parallel

List all other air contaminant sources that are also vented to this control equipment: _____

List all egress point IDs (from Table 7-A) associated with this control equipment: _____

Other

Type: describe BURN OVEN WITH SECONDARY CHAMBER - CONTROLLED PYROLYSIS

Manufacturer: POLLUTION CONTROL PRODUCTS Year installed: 2007 Your ID for control equipment B002

Describe this control equipment: AFTERBURNER

Pollutant(s) controlled: PE/PM PE/PM₁₀ PE/PM_{2.5} OC VOC
 SO₂ NO_x CO Pb Other _____

Estimated capture efficiency (%): 99+ Basis for efficiency: MANUFACTURER'S SPECS

Design control efficiency (%): 99+ Basis for efficiency: MANUFACTURER'S SPECS

Operating control efficiency (%): 99 Basis for efficiency: _____

This is the only control equipment on this air contaminant source

If not, this control equipment is: Primary Secondary Parallel

List all other air contaminant sources that are also vented to this control equipment: _____

List all egress point IDs (from Table 7-A) associated with this control equipment: BURN OFF OVEN EXHAUST STACK

6. **Process Flow Diagram** - Attach a Process Flow Diagram to this application for this air contaminant source. See the application instructions for additional information.

PLEASE SEE FACILITY DESCRIPTION DRAWING

7. **Modeling information:** (Note: items in bold in Tables 7-A and/or 7-B, as applicable, are required even if the tables do not otherwise need to be completed. If applicable, all information is required.) An air quality modeling analysis is required for PTIs and PTIOs for new installations or modifications, as defined in OAC rule 3745-31-01, where either the increase of toxic air contaminants from any air contaminant source or the increase of any other pollutant for all air contaminant sources combined exceed a threshold listed below. This analysis is to assure that the impact from the requested project will not exceed Ohio's Acceptable Incremental Impacts for criteria pollutants and/or Maximum Allowable Ground Level Concentrations (MAGLC) for toxic air contaminants. (See Ohio EPA, DAPC's Engineering Guide #69 for more information.) Permit requests that would have unacceptable impacts cannot be approved as proposed. See the line-by-line PTI/PTIO instructions for additional information.

Complete Tables 7-A and 7-C for stack emissions egress points and/or Table 7-B and 7-C for fugitive emissions egress points below if the requested allowable annual emission rate for this PTI or PTIO exceeds any of the following:

- Particulate Emissions (PE/PM₁₀): 10 tons per year
- Sulfur Dioxide (SO₂): 25 tons per year
- Nitrogen Oxides (NO_x): 25 tons per year
- Carbon Monoxide (CO): 100 tons per year
- Lead (Pb): 0.6 ton per year
- Toxic Air Contaminants: 1 ton per year. Toxic air contaminants are identified in OAC rule 3745-114-01.

Section II - Specific Air Contaminant Source Information

Facility ID: 13-18-00-5421

Emissions Unit ID: _____

Company Equipment ID: B002

Complete Table 7-A below for each stack emissions egress point. An egress point is a point at which emissions from an air contaminant source are released into the ambient (outside) air. List each individual egress point on a separate pair of lines. In each case, use the dimensions of the tallest nearby (or attached) building, building segment or structure.

Table 7-A, Stack Egress Point Information

① Company ID for the Egress Point B002	Type Code* B	Dimensions or Diameter 14" I.D.	Height from the Ground (ft) 32'	Temp. at Max. Operation (F) 1550°	Flow Rate at Max. Operation (ACFM) 350	Minimum Distance to Fence Line (ft) 57'
Company Description for the Egress Point BURNOFF OVEN STACK	Shape: round, square, rectangular ROUND	Cross Sectional Area 154 in²	Base Elevation (ft) 0	Building Height (ft) 17'	Building Width (ft) 20' 4"	Building Length (ft) 16' 8"

② Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

③ Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

④ Company ID for the Egress Point	Type Code*	Dimensions or Diameter	Height from the Ground (ft)	Temp. at Max. Operation (F)	Flow Rate at Max. Operation (ACFM)	Minimum Distance to Fence Line (ft)
Company Description for the Egress Point	Shape: round, square, rectangular	Cross Sectional Area	Base Elevation (ft)	Building Height (ft)	Building Width (ft)	Building Length (ft)

*Type codes for stack egress points:

- A. vertical stack (unobstructed): There are no obstructions to upward flow in or on the stack such as a rain cap.
- B. vertical stack (obstructed): There are obstructions to the upward flow, such as a rain cap, which prevents or inhibits the air flow in a vertical direction.
- C. non-vertical stack: The stack directs the air flow in a direction which is not directly upward.

Complete Table 7-B below for each fugitive emissions egress point. List each individual egress point on a separate line. Refer to the description of the fugitive egress point types below the table for use in completing the type column of the table. For an air contaminant source with multiple fugitive emissions egress points, include only the primary egress points.

Table 7-B, Fugitive Egress Point Information

① Company ID or Name for the Egress Point <p style="text-align: center; font-size: 1.2em;">NONE</p>	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

② Company ID or Name for the Egress Point	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

③ Company ID or Name for the Egress Point	Type* (check one) <input type="checkbox"/> Area <input type="checkbox"/> Volume	Area Source Dimensions (Length x Width, in feet)	Volume Source Dimensions (Height x Width, in feet)
Company Description for the Egress Point	Release Height (ft)	Exit Gas Temp. (only if in excess of 100° F) (° F)	Minimum Distance to the Fence Line (ft)

*Types for fugitive egress point:

Area: an open fugitive source characterized as a horizontal area (L x W) with a release height. For irregular surfaces such as storage piles, enter dimensions of an average cross section; release height is entered as half of the maximum pile height. For process sources such as crushers, use the process opening (e.g., area of crusher hopper opening) and ignore material handling and storage emissions points.

Volume: an unpowered vertical opening, such as a window or roof monitor, characterized as a vertical area (W x H) with a release height, measured at the midpoint of the opening. Multiple openings in a building may be averaged, if necessary.

Use the same Company Name or ID for the Egress Point in Table 7-C that was used in Table 7-A or 7-B. See the line-by-line PTI/PTIO instructions for additional information.

Table 7-C, Egress Point Location

Company Name or ID for the Egress Point (as identified above)	Egress Point Latitude	Egress Point Longitude
BURNOFF OVEN STACK	41 deg 25 min 35 sec	-81 deg 46 min 24 sec
	deg min sec	deg min sec
	deg min sec	deg min sec
	deg min sec	deg min sec
	deg min sec	deg min sec

Section II - Specific Air Contaminant Source Information

Facility ID: 13-18-00-5421

Emissions Unit ID: _____

Company Equipment ID: B002

8. Request for Enforceable Restrictions - As part of this permit application, do you wish to propose voluntary restrictions to limit emissions in order to avoid specific requirements listed below, (i.e., are you requesting state-only enforceable limits or state and federally enforceable limits to obtain synthetic minor status)?

- yes
- no
- not sure - please contact me to discuss whether this affects the facility.

If yes, why are you requesting enforceable restrictions? Check all that apply.

- a. to avoid being a major Title V source (see OAC rule 3745-77-01 and OAC rule 3745-31)
- b. to avoid being a major MACT source (see OAC rule 3745-31-01)
- c. to avoid being a major stationary source (see OAC rule 3745-31-01)
- d. to avoid being a major modification (see OAC rule 3745-31-01)
- e. to avoid an air dispersion modeling requirement (see Engineering Guide # 69)
- f. to avoid BAT requirements (see OAC rule 3745-31-05(A)(3)(b))
- g. to avoid another requirement. Describe: _____

If you checked a., b. or c., please attach a facility-wide potential to emit (PTE) analysis (for each pollutant) and synthetic minor strategy to this application. (See application instructions for definition of PTE.) If you checked d., please attach a net emission change analysis to this application. If you checked e., f. or g., please attach a description of the restrictions proposed and how compliance with those restrictions will be verified.

9. Continuous Emissions Monitoring -- Does this air contaminant source utilize any continuous emissions monitoring (CEM) equipment for indicating or demonstrating compliance? This does not include continuous parametric monitoring systems.

- yes
- no

If yes, complete the following information.

Company Name or ID for the Egress Point _____

CEM Description _____

This CEM monitors (check all that apply):

9 Opacity 9 Flow 9 CO 9 NOx 9 SO₂ 9 THC 9 HCl 9 HF 9 H₂S 9 TRS 9 CO₂ 9 O₂ 9 PM

10. EAC Forms - The appropriate Emissions Activity Category (EAC) form(s) must be completed and attached for each air contaminant source unless a general permit is being requested. At least one complete EAC form must be submitted for each air contaminant source for the application to be considered complete. Refer to the list attached to the application instructions. Please indicate which EAC form corresponds to this air contaminant source.

3102

EMISSIONS ACTIVITY CATEGORY FORM INCINERATOR (WASTE COMBUSTION) OPERATION

This form is to be completed for each incinerator (waste combustion). State/Federal regulations which may apply to incinerator (waste combustion) operations are listed in the instructions. Note that there may be other regulations which apply to this emissions unit which are not included in this list.

1. Reason this form is being submitted (Check one)

New Permit Renewal or Modification of Air Permit Number(s) (e.g. N001) _____

2. Maximum Operating Schedule: 24 hours per day; 365 days per year

If the schedule is less than 24 hours/day or 365 days/year, what limits the schedule to less than maximum? See instructions for examples. _____

3. Waste Type: Municipal/Residential/Industrial
 Hospital, Medical, or Infectious
 Sewage Sludge
 Human or Animal Remains (Crematory)
 Hazardous
 Salvageable Material
 Other (describe) BURNOFF OVEN FOR PVC

4. Type of incinerator:

Mass Burn/Modular Excess Air Mass Burn Waterwall
 Mass Burn Rotary Waterwall Mass Burn Refractory Wall
 Refuse-Derived Fuel-Fired Mass Burn Modular Starved Air
 Fluidized Bed Multiple Hearth
 Electric Infrared Burn-off Oven
 Industrial/Commercial Multiple Chamber
 Industrial/Commercial Single Chamber
 Other (describe) _____

5. Rated capacity: 9.85 lbs/hr
0.064 tons/day

6. Method of charging: Chute fed Mechanical loader
 Flue fed Manual
 Other, describe: _____

7. Type of charging: Continuous Batch Intermittent

8. Weigh Scale: Yes No

P

Premier

manufacturing corporation

December 7, 2009

Mr. George Baker
Chief of Enforcement
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

Dear Mr. Baker,

In reference to your letters of September 28, 2009 and November 10, 2009 regarding the NOTICE OF VIOLATION for Premier Manufacturing Corporation, Facility ID:13-18-00-5421, I must again request an additional extension for the completion of the PTI/PTIO application for our burnoff oven.

I called Ms. Adrienne LaFavre at the Ohio EPA office in Twinsburg on Thursday, December 3, to see if she was able to give me the information I needed to complete the application for the PTI/PTIO. I reiterated to her that the date I was given for the extension to complete the application was December 9, 2009. Ms. LaFavre indicated that my request had been interrupted with some emergency situations that required her attention, but that she would give my information her immediate consideration. She was also going to e-mail Mr. Andrew Kenny, CDAQ, on Thursday to explain the need for additional time, approximately December 15, 2009. I spoke with Mr. Andrew Kenny at the Cleveland Division of Air Quality, on Thursday, December 3, to apprise him of the circumstances. I regret the delay and ask for your indulgence with this matter.

As I previously stated, I expect the applications to be completed and mailed immediately after her consultation. If there are any questions or additional information regarding this request, please contact me at telephone number (216) 941-9700.

Sincerely,

PREMIER MANUFACTURING CORPORATION

Richard B. Guzik

Richard B. Guzik
Maintenance Manager

D.C. Dawson

D.C. Dawson
Vice President

DEC - 8 - 2009

CLEVELAND • CORPORATE OFFICE

12117 Bennington Avenue, Cleveland, OH 44135 • (216) 941-9700 • Fax: (216) 941-9719

www.premiermfg.com



Premier manufacturing corporation

November 9, 2009

Mr. George Baker
Chief of Enforcement
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

Dear Mr. Baker,

In reference to your letter of September 28, 2009 regarding the NOTICE OF VIOLATION for Premier Manufacturing Corporation, Facility ID: 13-18-00-5421, I am requesting additional time to complete the PTL/PTIO application for our burnoff oven.

I spoke with Mr. Andrew Kenny at the Cleveland Division of Air Quality and requested some assistance and clarification with the application. He gave me the name of Adrian LaFavre at the Ohio EPA office in Twinsburg, Ohio. I was finally able to speak with Ms. LaFavre on Monday, November 02, 2009. Ms. LaFavre has scheduled a visit to our facility on November 23, 2009 to assist me with the permit applications. This was the earliest date in her schedule that she was able to give me.

I expect the applications to be completed and mailed immediately after her consultation.

If there are any questions or additional information regarding this request, please contact me at telephone number (216) 941-9700.

Sincerely,

PREMIER MANUFACTURING CORPORATION

Richard B. Guzik

Richard B. Guzik
Maintenance Manager

D.C. Dawson
Vice President

CLEVELAND • CORPORATE OFFICE

12117 Bennington Avenue. Cleveland. OH 44135 • (216) 941-9700 • Fax: (216) 941-9719



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/564-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL #70022030000118088299
RETURN RECEIPT REQUESTED

November 10, 2009

Mr. Rich Guzik
Premier Manufacturing Corporation
12117 Bennington Avenue
Cleveland, OH 44135

FACILITY ID: 13-18-00-5421
RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION

Dear Mr. Guzik:

On September 28, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Premier Manufacturing Corporation (Premier) submit a Permit-to-Install/Operate (PTIO) application for the PVC Bake Off oven currently operating at Premier, by November 9, 2009. CDAQ is in receipt of a request for a deadline extension dated November 9, 2009.

You are expected to comply with submitting a PTIO application for the PVC Bake Off oven currently operating at Premier by December 9, 2009. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit a PTIO application for the PVC Bake Off oven to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Premier: 13-18-00-5421.

Sincerely,

George Baker

Chief of Enforcement, CDAQ



GB/ak |K

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005421\2009-8-27 RCAP.doc



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 #70022030000118088343
RETURN RECEIPT REQUESTED

December 17, 2009

Mr. Rich Guzik
Premier Manufacturing Corporation
12117 Bennington Avenue
Cleveland, OH 44135

FACILITY ID: 13-18-00-5421
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Rich Guzik:

On September 28, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Premier Manufacturing Corporation to submit a permit-to-install/operate (PTIO) application for the PVC Bake-off Oven. CDAQ is in receipt of a PTIO application for the PVC Bake-off Oven on December 10, 2009.

The corrective action plan was received and 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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Premier Manufacturing Corporation: 13-18-00-5421.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement, CDAQ

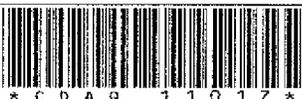
GB/ak



cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005421\2009-8-27 NEAR.doc

CDAQ DAPC Office Patch Sheet

CDAQ staff notes: Place a copy of this sheet on top of each NOV document for each NOV that matches the Record ID identified below.

Department*	DAPC	 * D A P C *
Sub Department		 * *
Office location	CDAQ	 * C D A Q *
Media	Air	 * A I R *
Document Type	NOV	 * N O V *
Document subtype	Permit	 * P E R M I T *
Program	Enforcement	 * *
County	County	 * C O U N T Y A H O G A *
ID info	1318008070	 * 1 3 1 8 0 0 8 0 7 0 *
Name		 * S A T E L L I T E D R Y C L E A N E R S *
Date:	1/11/2010	 * 1 / 1 1 / 2 0 1 0 *
Record ID	CDAQ_11017	 * C D A Q 1 1 0 1 7 *



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 : 7003 1010 0004 2923 4567
RETURN RECEIPT REQUESTED

January 11, 2010

Larry Harville
Satellite Dry Cleaners
3528 East 131st Street
Cleveland, Ohio 44120

NON-HPV
EMISSIONS VIOLATION

FACILITY ID: 13-18-00-8070

NOTICE OF VIOLATION: Failure to comply with terms and conditions of permit-to-install (PTI) #13-3247 and failure to submit a Permit-to-Operate (PTO) application for D001

Dear Mr. Larry Harville:

On December 18, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Satellite Dry Cleaners located at 3528 East 131st Street 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.

Satellite Dry Cleaners failed to submit a PTO application as specified in PTI #13-3247 within 30 days after commencing operation of emission unit (EU) D001: Permac Flex M40. This is a violation of Ohio Revised Code (ORC) Section 3704.05(C) and Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(b).

During the compliance inspection, utilizing a halogenated hydrocarbon detector, CDAQ detected a door gasket, filter housing, and filter gasket leaking perchloroethylene (PERC) on EU D001, which is in violation of PTI#13-3247(C)(1), Title 40 Code of Federal Regulations (CFR) Subpart M Section 63.322(k), and OAC Rule 3745-21-09(AA)(1)(e).

Satellite Dry Cleaners has also failed to:

Perform and record weekly perceptible leak checks, which is in violation of PTI #13-3247 (C)(1), Title 40 CFR Subpart M Section 63.322(k), and OAC Rule 3745-21-09(AA)(3) and (4)(b)(iv);



Conduct a monthly leak check using a halogenated hydrocarbon detector, which is in violation of Title 40 CFR Subpart M Section 63.322(k), and 63.322(o)(1)(i);

Record the monthly PERC usage, which is in violation of PTI#13-3247 (D)(1)(b), and Title 40 CFR Subpart M Section 63.324(d)(1);

Record the rolling 12-month average PERC usage, which is in violation of PTI#13-3247 (D)(1)(c), and Title 40 CFR Subpart M Section 63.324(d)(2);

Maintain records of 5 years of PERC purchases, which is in violation of PTI#13-3247 (D)(1)(a), and Title 40 CFR Subpart M Section 63.324(d);

Measure and record weekly the exhaust temperature on the outlet of the refrigerated condenser which is in violation of PTI#13-3247 (C)(2), and Title 40 CFR Subpart M Section 63.323(a)(1);

Record the amount, in pounds, of clothes dry cleaned with PERC, from January 1 to December 31 of each year, which is in violation of PTI#13-3247 (D)(2)(b), and OAC Rule 3745-21-09(AA)(4)(d).

In addition, Satellite Dry Cleaners is in violation of the City of Cleveland's Codified Ordinance Chapters 259.01, and 263.01 for failing to obtain 2007 and 2008 city permits by submitting city permit fees.

At the time of inspection Satellite Dry Cleaners was unable to present any monitoring or recordkeeping requirements. Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Satellite Dry Cleaners submit a Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001, within 30 days of receipt of this letter to CDAQ at the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that Satellite Dry Cleaners:

Submit copies of the invoices for the three gaskets that are to be replaced, and also the dates on which installation occurs;

Submit a copy of the halogenated hydrocarbon detector purchase invoice;

Submit a copy of a sample of the weekly perceptible leak checks;

Submit a copy of a sample of the pounds of clothes dry cleaned with PERC;



Submit a copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage;

Submit a copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser.

Submit all of the above within 30 days of receipt of this letter to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that Satellite Dry Cleaners obtain 2007 and 2008 city permits by submitting city permit fees, within 30 days of receipt of this letter to CDAQ at the following address:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

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.

The appropriate permit application(s) and supplemental form(s) are included with this letter. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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 the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518.

CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.



OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, 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 Bryan Sokolowski at (216) 491-8644. All correspondence with CDAQ must include the Ohio EPA facility identification number for Satellite Dry Cleaners: 13-18-00-8070.

Sincerely,

Lynda Kimmy for G.B.

George Baker
Chief of Enforcement

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008070\2009-12-18 NOV.docx

encl: 2010 Dry Cleaning Calendar, PTIO Application, EAC Form, and City Permit Fee Invoices for 2007 and 2008



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Frievew Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-6047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL : 7009 3410 0002 1933 7922
RETURN RECEIPT REQUESTED

March 2, 2010

Larry Harville
Satellite Dry Cleaners
3528 East 131st Street
Cleveland, Ohio 44120

FACILITY ID: 13-18-00-8070

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to comply with terms and conditions of permit-to-install (PTI) #13-3247 and failure to submit a Permit-to-Install/Operate (PTIO) application for emission unit (EU) D001

Dear Mr. Larry Harville:

On January 11, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Satellite Dry Cleaners:

Submit a Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001.

Submit copies of the invoices for the three gaskets that are to be replaced, and also the dates on which installation occurs.

Submit a copy of the halogenated hydrocarbon detector purchase invoice.

Submit a copy of a sample of the weekly perceptible leak checks.

Submit a copy of a sample of the pounds of clothes dry cleaned with PERC.

Submit a copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage.

Submit a copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser.

Obtain 2007 and 2008 city permits by submitting city permit fees.

CDAQ is in receipt of payment of 2007 and 2008 city permit fees dated January 19, 2010, and copies of the invoices for the three gaskets that were replaced dated January 13, 2010.



You are still expected to comply with the following:

Submit a Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001, within seven days of receipt of this letter to CDAQ at the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Submit a copy of the halogenated hydrocarbon detector purchase invoice.

Submit a copy of a sample of the weekly perceptible leak checks.

Submit a copy of a sample of the pounds of clothes dry cleaned with PERC.

Submit a copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage.

Submit a copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser.

Submit all of the above within seven days of receipt of this letter to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Bryan Sokolowski at (216) 420-7663.



All correspondence with CDAQ must include the Ohio EPA facility identification number for Satellite Dry Cleaners: 13-18-00-8070.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/BS |K

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008070\2009-12-18 RCAP.docx



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 2030 0001 1807 8054
RETURN RECEIPT REQUESTED

April 9, 2010

Larry Harville
Satellite Dry Cleaners
3528 East 131st Street
Cleveland, Ohio 44120

FACILITY ID: 13-18-00-8070

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to comply with terms and conditions of permit-to-install (PTI) #13-3247 and failure to submit a Permit-to-Install/Operate (PTIO) application for emission unit (EU) D001

Dear Mr. Larry Harville:

On January 11, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Satellite Dry Cleaners:

Submit a Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001.

Submit copies of the invoices for the three gaskets that are to be replaced, and also the dates on which installation occurs.

Submit a copy of the halogenated hydrocarbon detector purchase invoice.

Submit a copy of a sample of the weekly perceptible leak checks.

Submit a copy of a sample of the pounds of clothes dry cleaned with PERC.

Submit a copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage.

Submit a copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser.

Obtain 2007 and 2008 city permits by submitting city permit fees.



CDAQ is in receipt of the following:

Payment of 2007 and 2008 city permit fees dated January 19, 2010.

Copies of the invoices for the three gaskets that were replaced dated January 13, 2010.

A copy of the halogenated hydrocarbon detector purchase invoice dated March 17, 2010.

A copy of a sample of the weekly perceptible leak checks dated March 17, 2010.

A copy of a sample of the pounds of clothes dry cleaned with PERC dated March 17, 2010.

A copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage dated March 17, 2010.

A copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser dated March 17, 2010.

CDAQ is aware of a meeting Satellite Dry Cleaners will have with Adrienne LaFavre of the Office of Compliance Assistance and Pollution Prevention (OCAPP), on April 20, 2010. Satellite Dry Cleaners is still expected to submit a completed Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001. The completed permit must be submitted to CDAQ no later than May 4, 2010, to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Satellite Dry Cleaners: 13-18-00-8070.

Sincerely,

Linda Kimmony for G.B.
George Baker
Chief of Enforcement, CDAQ

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008070\2009-12-18 RCAP2.docx

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:

Larry Harville
 Satellite Dry Cleaners
 3528 East 131st Street
 Cleveland, Ohio 44120

2. Article Number
 (Transfer from s. 7003 1010 0004 2923 4567)

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Jerry Harville* Agent
 Addressee

B. Received by (Printed Name) Larry Harville

C. Date of Delivery 7-13-10

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

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:

Larry Harville
 Satellite Dry Cleaners
 3528 East 131st Street
 Cleveland, Ohio 44120

2. Article Number
 (Transfer from s. 7009 3410 0002 1933 7922)

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Jerry Harville* Agent
 Addressee

B. Received by (Printed Name) Larry D. Harville

C. Date of Delivery 11-11-10

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

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:

Larry Harville
 Satellite Dry Cleaners
 3528 East 131st Street
 Cleveland, Ohio 44120

2. Article Number
 (Transfer from s. 7002 2030 0001 1807 8054)

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Larry Harville* Agent
 Addressee

B. Received by (Printed Name) Larry Harville

C. Date of Delivery 4-14-10

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



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Frieview Plaza, Suite 200
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 : 7003 1010 0004 2923 5892
RETURN RECEIPT REQUESTED**

May 10, 2010

Larry Harville
Satellite Dry Cleaners
3528 East 131st Street
Cleveland, Ohio 44120

**FACILITY ID: 13-18-00-8070
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Larry Harville:

On January 11, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation for Satellite Dry Cleaners for failing to comply with terms and conditions of permit-to-install (PTI) #13-3297, failing to submit a permit-to-operate (PTO) application for Emission Unit (EU) D001, and failure to obtain 2007 and 2008 city permits.

On January 13, 2010 Satellite Dry Cleaners submitted the invoice for the three gaskets to be replaced, January 19, 2010, Satellite Dry Cleaners paid 2007 and 2008 city permit fees, and March 17, 2010, CDAQ received copies of the requested recordkeeping requirements.

On April 9, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Receipt of Corrective Action Plan requiring Satellite Dry Cleaners to submit a Permit-to-Install/Operate (PTIO) Application and Emissions Activity Category (EAC) Form for EU D001: Permac Flex M40. CDAQ received the PTIO Application and EAC Form for EU D001 on May 4, 2010.

The corrective action plan was received and 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Satellite Dry Cleaners: 13-18-00-8070.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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