



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 0510 0002 2427 6730  
RETURN RECEIPT REQUESTED**

April 27, 2007

Derek Hendrix  
Cleveland Public Power  
1300 Lakeside Ave.  
Cleveland, Oh 44114

**FACILITY ID: 1318000133**

**RECEIPT OF CORRECTIVE ACTION PLAN: Exceeding Emissions Limitations and Inadequate Record Reporting**

Dear Mr. Hendrix:

On March 27, 2007, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation stating that according to information provided by Cleveland Public Power (CPP) emissions limitations were exceeded and inadequate record reporting were inadequately maintained. CDAQ is in receipt of a corrective action letter dated April 13, 2007. You are expected to comply with taking grab samples per shipment and having the sample analyzed by CPP's Safety Department. In addition, CDAQ accepts CPP's corrective action plan to sample and analyze the existing fuel oil located in the aboveground storage tank. CPP must forward the results to CDAQ by May 8, 2007.

CDAQ is aware of CPP's particulate emission testing exception. However, CPP is required to maintain records of actual particulate emissions for B001 & B002. Based on the information CPP emailed to CDAQ, there were 12,612 gallons used in both turbines. Not 1,000 gallons (the amount used to auto-calculate particulate emissions in the Stars program). CPP must provide an explanation for exceeding the particulate emissions by May 8, 2007.

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 Mike Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cleveland Public Power: 1318000133.

Sincerely,

A handwritten signature in cursive script that reads "George Baker".

George Baker  
Chief of Enforcement, CDAQ

GB/ms

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\1318000133\2007-04-27 RCAP.doc



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Department of Public Utilities  
Cleveland Public Power  
1300 Lakeside Avenue  
Cleveland, Ohio 44114-1135  
216/664-3922 • Fax: 216/420-7514  
www.cpp.org



April 13, 2007

Valencia White  
Environmental Enforcement Specialist  
Cleveland Bureau of Air Pollution Control  
1925 St. Clair Avenue  
Cleveland, OH 44114



RE: Corrective Action Letter (Exceeding Emissions Limitations and Inadequate Record Reporting).

Dear Ms. White:

On January 30, 2007 a representative of the Cleveland Division of Air Quality (Mr. Mike Samcc) inspected Cleveland Public Power's (CPP's) Westside Service Center at 2490 West 41<sup>st</sup> Street. Following the inspection a letter was issued by the Mr. Samecc notifying CPP that we were operating sources in violation of Title V permit terms & conditions, the Ohio Administrative Code Rule 3745-77-01(C)(1), and Ohio Revised Code sections 3704.05(A), (C), and (G).

In response to this letter CPP sent a Corrective Action Plan letter to the Cleveland Division of Air Quality dated April 13, 2007. In this letter CPP stated that CPP would take one (1) grab sample from our existing fuel oil aboveground storage tanks and have that sample analyzed per our Title V permit. On April 25, 2007 a representative sample from our existing ASTs was collected and analyzed by EA Group Laboratories for Sulfur and heat content in accordance with ASTM Method D-1989 and ASTM D-4294, respectively. The results of this sampling event are included below. A copy of the lab report is included as **Attachment 1**.

## ANALYSIS RESULTS

Sample Date	Gallons Received	Sulfur %	BTU/Gallon	Lbs. SO <sub>2</sub> /mm BTU
April 25, 2007	Sampled from existing AST's	0.62%	124,439	0.0632

## WEIGHTED MONTHLY AVERAGES

	Sample date	Total fuel (gallons)	Average SO <sub>2</sub> Emission Rate (lbs./mm BTU)	Average heat content (BTU/gallon)
	April 25, 2007	Sampled from existing AST's	0.62%	124,439

In regards to the second violation it was stated that CPP is in violation for exceeding the particulate emission (PE) limitation for fuel oil in B001 & B002. CPP respectfully requests an extension to investigate this issue. The 12,612 gallons burned could include the diesel generators located at West 41<sup>st</sup>, or it may not have been reported to me accurately, or there may be other issues. We need a little more time to alleviate this issue. Lastly, in your calculations did you divide the 12,612 gallons burned in ½ for the two (2) turbines located at West 41<sup>st</sup>? If the 12,612 gallons burned is accurate each individual turbine did not burn this amount each emission unit (B001 & B002) should have only burned half this amount. Thank you for your time and consideration in this matter.

Please feel free to contact me at 216-664-3922 if you have any questions.

Sincerely,



Derek K. Hendrix  
Safety Programs Manager  
Cleveland Public Power

Enclosure

Cc: Environmental File

# ATTACHMENT 1



# EA GROUP

25th Anniversary  
1982-2007

May 4, 2007

Mr. Derek Hendrix  
**Cleveland Public Power**  
1300 Lakeside Avenue  
Cleveland, Ohio 44114

RE: **Fuel Oil Sampling and Analysis**  
Storage Tanks at 2490 West 41<sup>st</sup> Street & Aspinwall Facility, Ohio  
OH33695

## Description of Work

EA Group, Mentor, Ohio was contracted by Cleveland Public Power (CPP) to perform sampling and analysis of fuel oil from a storage tank at 2490 West 41<sup>st</sup> Street. Although not specified in the Scope of Work Agreement, fuel oil from a tank at the Aspinwall facility was also requested to be tested. Because only one sample was provided for in the Scope, CPP requested that a composite sample of the fuel oils from the two tanks be submitted for analysis. Sampling was conducted on April 25, 2007 by EA Group representative Scott Landis.

## Sampling and Analytical Work

A discrete sample was collected from the West 41<sup>st</sup> Street tank using a disposable bailer and transferring into a sample container, filling the container to ½-full. At the Aspinwall facility, fuel oil was discharged directly into the sample container from a valve, fully filling the container. The sample was then delivered directly to EA Group's Laboratory Division. Chain-of-Custody protocol was maintained for the sample collected. The sample was analyzed for BTU content in accordance with ASTM Method D1989 and for sulfur in accordance with ASTM D4294. Results of the analyses are detailed in the Laboratory Analytical Report in Appendix A.

The 50/50 composite sample of fuel oil from the two tanks had a BTU content of 19,353 Btu/lb and a sulfur content of 0.062%.

Please contact the undersigned if you require any additional information or interpretation. Thank you for consulting EA Group.

Sincerely,

**EA Group**

Timothy S. Bowen,  
Vice President/Technical Director



## APPENDIX A

Laboratory Analytical Report(s)



EA GROUP

## Laboratory Analytical Report

### Cleveland Public Power

2490 W. 41st. Street

Cleveland, OH 44113

Attention:

Derek Hendricks

### Project Identification

Analysis of Petroleum Fuel

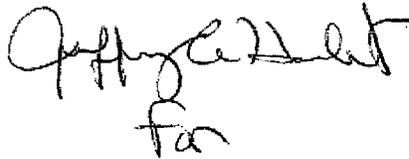
OH33695

**Purchase Order:**

EA Group

**Order Number**

0704-00359



for

Donald R. Richner, CIH

Laboratory Manager

May 3, 2007



# EA GROUP

## Project Summary

The following analytical report contains results as requested for samples submitted to EA Group. The results included in this report have been reviewed for compliance with the analytical methods indicated in this report. All data has been found to be compliant with accepted laboratory protocol. Exceptions, if any, are noted below. Industrial hygiene reports, air and/or surface concentrations results are based upon sampling information provided by the client. Unless otherwise noted the following apply: Sample condition was acceptable upon receipt unless otherwise noted in the quality control narrative and industrial hygiene results will not be blank corrected. Analyst initials of REF indicate analysis performed at a subcontract facility. For a complete list of accreditations maintained by EA Group, please contact client services.

## Data Interpretation

For assistance with report interpretation or questions regarding regulatory limits, please contact Client Services at 440-951-3514 or customerservice@eagroup-ohio.com.

## Sample Summary

Sample Receive Date: 4/25/2007

EAG	Client
<u>Sample Identification</u>	<u>Sample Identification</u>
070400359 - 001	OH33695-042507-01

EAG	Client
<u>Sample Identification</u>	<u>Sample Identification</u>

## Quality Control Narrative

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Reproduction of this report is prohibited except in its entirety. Unless noted, soil, sludge, and sediment results are reported on dry weight basis. The "Sample Reporting Limit" is based on the method used for analysis and does not refer to any regulatory limit. These results relate only to the items tested.





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In response to this letter CPP has evaluated our Title V reporting procedures and have made several observations and corrections. In regards to the first violation it was stated that CPP is in violation for failing to collect and analyze grab samples of fuel oil used in B001 and B002. This violation was caused by a break down in communication between our Transformer Shop employees and our Safety Department. Our Transformer Shop employees manage and service all CPP's turbines and maintain any and all records for the turbines. CPP's Safety Department is responsible for all Title V reporting. Somewhere between the two (2) Departments the correct number of shipments of fuel oil received was not properly reported for CPP's turbines, thus resulting in inadequate reporting. However, as you will see in "Attachment 1" CPP has only received three (3) shipments of fuel oil for our turbines located at West 41<sup>st</sup> since January 2005. These three (3) shipments should have been sampled for Sulfur and heat content in accordance with ASTM Method D-240 and ASTM D-4294. Prior to 2005 shipments were being sampled correctly.

**Corrective Action:** Effective immediately CPP's Transformer Shop will contact CPP's Safety Department immediately upon the receipt of any fuel oil in the future. CPP's Transformer Shop will take one (1) grab sample per shipment of fuel oil and CPP's Safety Department will have that sample analyzed in accordance with our Title V permit terms & conditions. In addition, CPP will take one (1) grab sample from our existing fuel oil aboveground storage tank and have that sample analyzed for the proper parameters as well. The results of this sample will be forwarded to the Cleveland Division of Air Quality upon receipt.

In regards to the second violation it was stated that CPP is in violation for exceeding the particulate emission (PE) limitation for fuel oil in B001 & B002. As you will see in Attachment 2 in 2001 Mr. Leon Ang was contacted by CPP to have the Particulate Emissions Testing deleted from our Title V permit. In addition, a copy of CPP's 2005 Fee Emissions report for the turbines located at West 41st is also included in Attachment 2.

Please feel free to contact me at 216-664-3922 if you have any questions.

Sincerely,



Derek K. Hendrix  
Safety Programs Manager  
Cleveland Public Power

Enclosure

Cc: Environmental File