



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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#70093410000219342049
RETURN RECEIPT REQUESTED**

June 16, 2011

Jim Krimmel
Zaclon LLC
2981 Independence Road
Cleveland, OH 44115

**FACILITY ID: 13-18-00-0151
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Krimmel:

On May 10, 2011, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Zaclon LLC (Zaclon) to submit a corrective action plan describing steps that will be taken ensuring Zaclon will report malfunctions in accordance with OAC rule 3745-15-06(B) should they occur in the future. CDAQ is in receipt of a corrective action plan dated June 14, 2011, outlining steps that will be taken to prevent future malfunctions and report malfunctions should they occur.

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 Zaclon LLC: 13-18-00-0151.

Sincerely,

A handwritten signature in cursive script that reads "Linda Kimmy".

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/ak

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318000151\2011-5-10 NEAR.doc



JUN 14 2011

June 7, 2011

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

Facility ID: 13-18-00-0151

Mr. Kenney:

This letter is in response to the letter dated May 10, 2011, a notice of violation for failing to report a malfunction. The following will describe the nature of the failure and the corrective actions taken to correct the issues.

The process in question generates HCl gas which is consumed as it is generated within the batch process. Excess HCl gas is produced at the end of the batch and normally flows to the scrubber until the process flows are turned off. A spent acid tank is within the vent piping network to the scrubber. Enough pressure was generated in the piping system to the scrubber that the HCl gas escaped through the spent acid tank.

The Coast Guard contacted Zaclon concerning a possible fume release that seemed to come from Zaclon's process which was reported by someone on the river. The operator immediately stopped all batch processes and began to investigate the possible source of a fume release. The initial thought was that a rupture disc had failed. All of the rupture discs in the process were inspected and found to be intact. The piping to the scrubber was then opened to check for a build up within the pipe. One section of pipe was found to be almost closed. The blockage observed led us to the conclusion the HCl gas or fumes escaped through the spent acid tank from pressure built up in the process at end point due to the blockage. The blockage was cleared and the scrubber was back in service less than 24 hours after the initial contact to the operator. The process was then restarted without incident.

The piping network to the scrubber is on an inspection and preventative maintenance schedule for clean out every 6 months. The most recent inspection and clean out took place four months ago. We will increase the preventative maintenance schedule for the piping network to every 3 months and note any changes in the build up of material within the piping.

The operator in this work area is very responsible and takes pride in his work and how the process operates. Any production or operational issues are taken care of immediately by the operator. In this case, he was not aware of this problem. We have implemented a program to improve communication of activities of production and maintenance in the work area. Awareness training was performed about current air permits and the responsibility of reporting malfunctions in this area and in other parts of the plant. Any known malfunctions or outages in pollution control equipment will be reported to management as soon as possible and in turn reported to the Cleveland Division of Air Quality.

If there are any questions please feel free to contact me at 216 271 1718.

Respectfully,

A handwritten signature in black ink, appearing to read "Jim B. Krimmel". The signature is fluid and cursive, with a large initial "J" and "K".

Jim Krimmel
President
Zaclon LLC