



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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Cleveland, Ohio 44114-1839
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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7002 2030 0001 1807 7965
RETURN RECEIPT REQUESTED

August 20, 2009

Gerald Goldstein
American Bronze Corporation
2941 Broadway Ave.
Cleveland, OH 44115-3605

NON-HPV

FACILITY ID: 13-18-00-0248

NOTICE OF VIOLATION: failure to submit quarterly reports and failure to submit permit-to-install and operate application

Dear Mr. Goldstein:

On July 14, 2009, the Cleveland Division of Air Quality (CDAQ) inspected American Bronze Corporation (American Bronze) located at 2941 Broadway 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.

American Bronze's operation of emissions units (EU) P001: a Wheelabrator 36 and 42 shot blast, Super Tumblast, controlled by 2 baghouses, HP2000 and 96HP8 and P007: brass pouring with baghouse are in violation of their 6/19/98 permits-to-operate (PTO), Part I.3.b. and the Ohio Revised Code (ORC) Section 3704.05(C) and (D) for failing to submit quarterly deviation reports. CDAQ has not received any quarterly deviation reports since the PTOs were issued on 6/19/98.

American Bronze's operation of EU P011: Wheelabrator #3 is in violation of its 2/28/08 PTO, Part I.3.b. and ORC Section 3704.05(C) and (D) for failing to submit quarterly deviation reports. CDAQ has not received any quarterly deviation reports since the PTO was issued on 2/28/08.

American Bronze obtained registration status for EUs P005, P006 and P008 on December 14, 1987. According to OAC Rule 3745-31-08(B) sources placed on registration status are not subject to any mass emissions limitation or control requirement. However, OAC Rule 3745-31-08(D) allows CDAQ to request that American Bronze complete permit-to-install and operate (PTIO) applications to demonstrate that the furnaces are not subject to a mass emissions limitation.



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that American Bronze submit deviation reports for the first quarter of 2008 and subsequent quarters for EUs P001, P007, and P011; and PTIO applications for EUs P005, P006, and P008 to the following enforcement representative:

David Wagner
Cleveland Division of Air Quality
75 Erieview Plz., 2nd Fl.
Cleveland, OH 44114-1839

Your deviation reports must be received by CDAQ within 14 days of your receipt of this letter. CDAQ must receive the PTIO applications with 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 applications and supplemental forms 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 ORC Section 3704.99(A), which allows fines of not more than \$25,000 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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA facility identification number for American Bronze: 13-18-00-0248.

Sincerely,

George P. Baker
Chief of Enforcement

GPB/dlw

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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