



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 #70022030000118084543
RETURN RECEIPT REQUESTED**

September 22, 2008

Adrienne Klein
The Art Galvanizing Works, Inc.
3935 Valley Rd
Cleveland, OH
44109

NON-HPV

FACILITY ID: 13-18-00-0732

NOTICE OF VIOLATION : Failure to adequately control visible emissions, failure to maintain proper pressure gauge range for baghouse operation, failure to perform weekly checks for visible emissions, and failure to submit semi-annual deviation reports of pressure drop and visible emissions

Dear Ms. Klein:

On September 11, 2008, the Cleveland Division of Air Quality (CDAQ) inspected The Art Galvanizing Works, Inc. (Art Galvanizing) located at 3935 Valley Road in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Art Galvanizing's operation of emissions units F001 and F002, batch hot-dip galvanizing lines, are in violation of their applicable terms and conditions permit-to-operate (PTO), issued January 11, 2007, in that Art Galvanizing failed to control visible emissions from the baghouse outlet (PTO Section II A. 1. Table 1); failed to maintain the pressure drop across the baghouse within a range of 1 to 6 inches of water (PTO Section II B. 1); failed to perform weekly checks for visible emissions; and failed to submit semi-annual pressure drop and visible emissions deviation reports (PTO Section II C.)

The above violations are also violations of the Ohio Administrative Code (OAC) rule 3745-17-08(B)(3)(b), and Ohio Revised Code sections 3704.05(A), (C), and (G).

During the inspection, CDAQ inspectors, observed a pressure gauge reading of 6.5 inches of water. Per Art Galvanizing's PTO, the baghouse pressure gauge shall be maintained within a range of 1-6 inches of water.



In addition, CDAQ inspectors observed visible emissions coming from the baghouse outlet on September 11, 2008. According to OAC rule 3745-17-08(B)(3)(b), particulate emissions shall be controlled to an outlet emission rate of not greater than 0.030 grain per dry standard cubic foot of exhaust gases, or there are no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Additionally, Art Galvanizing failed to supply CDAQ with documentation of weekly visible emissions checks during the inspection. Weekly checks are required for any visible emissions of fugitive dust from the egress points (i.e. building windows, doors, roof monitors, etc.) serving the emissions unit. The presence or absence of any visible fugitive dust emissions shall be noted in an operations log.

Furthermore, Art Galvanizing failed to submit semi-annual written reports identifying deviations of pressure drop readings and visible emissions to CDAQ.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Art Galvanizing Works submit intent to test for EU's F001 and F002 to verify 0.030 grains/dscf and a corrective action plan addressing the above noted violations to the following enforcement representative:

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

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Art Galvanizing Works: 13-18-00-0732.

Sincerely,

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

George Baker

Chief of Enforcement, CDAQ

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\1318000732\2008-08-28 NOV 2.doc

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:

Adrienne Klein
 Art Galvanizing
 3935 Valley Rd
 Cleveland OH
 44109

2. Article Number

(Transfer from service label)

7002 2030 0001 1808 9036

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1035

RCAP 2

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Adrienne Klein

Agent

Addressee

B. Received by (Printed Name)

ADRIENNE KLEIN

C. Date of Delivery

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:

Adrienne Klein
 The Art Galvanizing Works
 3935 Valley Rd
 Cleveland OH
 44109

2. Article Number

(Transfer from service label)

7002 2030 0001 1808 8961

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1035

RCAP

1318000732

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Adrienne Klein

Agent

Addressee

B. Received by (Printed Name)

ADRIENNE KLEIN

C. Date of Delivery

10-20-08

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:

Adrienne Klein
 Art Galvanizing Works
 3935 Valley Rd
 Cleveland, OH
 44109

2. Article Number

(Transfer from service label)

7002 2030 0001 1808 4543

PS Form 3811, August 2001

Domestic Return Receipt

181300073

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Adrienne Klein

Agent

Addressee

B. Received by (Printed Name)

ADRIENNE KLEIN

C. Date of Delivery

10/20/08

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