



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 7003 1010 0004 2923 3171
RETURN RECEIPT REQUESTED

5/7/08

Ed Jakab
Meyer Products, LLC
18513 Euclid Ave.
Cleveland, OH 44112-1084

HPV-GC2

FACILITY ID: 13-18-00-1982

NOTICE OF VIOLATION: Improper record keeping, failure to submit reports and operation of equipment outside of specified terms and conditions.

Dear Mr. Jakab:

On 4/18/08, the Cleveland Division of Air Quality (CDAQ) inspected Meyer Products, LLC (Meyer's) located at 18513 Euclid Ave. in Cleveland, OH. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Meyer's operation of emissions units (EU) P006, P008, and Z004 is in violation of Permits-to-install (PTI) #'s 13-04252, 13-04636 and the Title V Permit, Part I(A)(1)(c)(ii)(iii) for failing to submit quarterly deviation reports (Z004, missing 4th quarter only) and semi-annual deviation reports for compliance year 2007.

Meyer's is in violation of PTI #13-3379 (F)(3)(a)(b) and Title 40 Code of Federal Regulations (CFR) 63.468 for failing to submit the annual solvent emission report for L001 year ending 2007.

Meyer's is in violation of 40 CFR 63.463 for failing to maintain chiller water at or below -10 °F and trichloroethylene (TCE) solvent temperature at or above 188 °F for L001. During the inspection, the chiller water temperature was observed at -2 °F. Also, weekly solvent temperature logs for 10/07 and 4/08 indicated temperatures below 188 °F for the TCE.

Meyer's is in violation of PTI #13-04636, Part III(D)(1) for P008 for failing to submit pressure drop excursion reports identifying all periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified. Pressure drop excursion reports should have been submitted to CDAQ as



part of the quarterly and semi-annual deviation reporting. Meyer's has been in violation since 4/07.

Note: CDAQ requested Meyer's to gather manufacturer's data to support the assertion that the pressure drop for the dust collector on P008 can not be maintained within the 4-6" of water as specified in the PTI. A PTI modification is required if appropriate documentation is provided.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Meyer's submit the required quarterly and semi-annual deviation reports for P006, P008 and Z004, the annual solvent emissions report for L001, excursion report(s) for P008, and a corrective action plan to assure the allowable temperature specifications for L001. Additionally, CDAQ requests Meyer's to provide the manufacturer's documentation along with a PTI modification request (if necessary) for P008 to the following enforcement representative:

Dave DeChant
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 DaveDeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Meyer Products, LLC: 13-18-00-1982.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker", written over a horizontal line.

George Baker
Chief of Enforcement, CDAQ

GB/dd A small, circular, faint stamp or mark located to the right of the initials "GB/dd".

- cc: Michael Javaras, Meyer Products, LLC
Denise Angus, Meyer Products, LLC
Paul Jack, Castle Bay, Inc.
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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