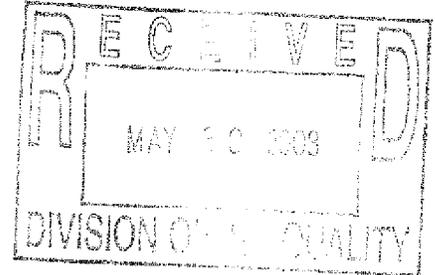




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May 28, 2008

Dave DeChant  
Environmental Enforcement Specialist  
Cleveland Department of Public Health  
Division of Air Quality  
1925 St. Clair Avenue NE  
Cleveland, Ohio 44114



Subject: Response To Notice Of Violations For Meyer Products, Facility Number 13-18-00-1982

Dear Mr. DeChant,

The following are Meyer Products responses to notice of violations delivered to us on May 15, 2008.

Upon researching our records, we noticed that the Deviation reports for the 4<sup>th</sup> quarter and the semi-annual deviation report for 2007 were filed with Cleveland Division of Air Quality in February 2008. We have certified letter response cards that were delivered to the CDAQ Office on 2/12/08. However, upon further examination we noticed that the quarterly reports had incorrect dates in the titles of the subject line. These have been corrected and are included in the enclosed package. In addition, we found no issues with the semi-annual deviation report. A copy of this original report is also included in this package.

Ref: PTI# 13-3379 (F) (3) (a) (b) and Title 40 Code of Regulations (CFR) 63.468 for failing to submit the annual solvent emission report for L001 year ending 2007.

Please find included in this package Meyer Product's 2007 Annual Solvent Emission Report for Unit L001.

Ref: Violation 40 CFR 63.463 for (a), failing to maintain chiller water at or below -10<sup>o</sup>F and (b), trichloroethylene (TCE) solvent temperature at or above 188 <sup>o</sup>F.

- a. Refrigeration service has been scheduled immediately for unit L001. This service person has been instructed to check the unit for proper refrigerant charge and an accurate in-line thermometer. Meyer Products has a long service history with this contractor. He feels the unit can easily be brought into specifications. Repairs are expected to be completed by May 30, 2008. Please be advised that this refrigeration unit has a defrost cycle to melt off accumulated ice. Therefore, temperature readings in the future must accommodate this fact.
- b. The temperature set point for the TCE heaters has been raised to maintain a minimum of 188 <sup>o</sup>F.

Ref: Violation PTI #13-04636, Part III (D)(1) for P008 failing to submit pressure drop excursion reports.

Pressure drop across the Torit dust collector on P008 is difficult to measure reliably because of the following:

1. This Torit unit was originally installed to evacuate two (2) plasma cutting tables which generated considerably more dust/fumes. The current laser replaced these two machines and the Torit was simply routed from the plasmas to the laser. Meyers Engineering and Maintenance believes that this unit may be over-sized and moving too many CFM for the laser-only application. This does not allow for discrete changes in pressure drop to be accurately measured throughout the workday.
2. Current controller is suspect from a reliability standpoint. IWI, Meyer's current vendor for servicing this unit, claims that this controller is out of date and first needs to be inspected and probably replaced. IWI claims that any disruption to the Torit unit, either electrical or pressure, causes the controller to default to zero.

IWI is scheduled to service this unit by July 7, 2008. Meyer Product's plans to properly size this Torit dust collector for the application and make all corrections to the controller.

A PTI modification will be submitted once this scope of work has been quoted by IWI.

Estimated completion date is August 15, 2008.

Finally, we could not find any documentation from either Torit (the OEM) or from IWI that verifies that a 4 to 6 inches of water pressure drop is ideal for P008.

We have submitted the above information to the best of our knowledge and appreciate the effort of your office in guiding us through this process.

Sincerely,

MEYER PRODUCTS



Michael Javanas  
Director of Operations



A Subsidiary of The Louis Berkman Work Products Company  
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