



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL : 7009 3410 0002 1934 0342
RETURN RECEIPT REQUESTED

August 23, 2010

James Walker
Tremco, Inc.
4475 East 175th Street
Cleveland, Ohio 44128

HIGH PRIORITY FACILITY

FACILITY ID: 13-18-00-2813

NOTICE OF VIOLATION: Failure to report a baghouse pressure deviation and the corrective action taken on their 1st quarter 2010 deviation report, and obtain a 2009 city permit.

Dear Mr. Walker:

On June 26, 2010, the Cleveland Division of Air Quality (CDAQ) inspected Tremco, Inc. located at 4475 East 175th Street 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.

From March 1st – March 4th 2010, Tremco, Inc. recorded a 15, 9.5, 8 and 7.5 inches of water pressure reading on the baghouse, which is a deviation from their 1.5 to 6 inches of water allowable. Tremco, Inc. failed to report the March 1st – March 4th deviation on their 1st Quarter 2010 deviation report, and submit the corrective action taken, which is a violation of Permit-to-Install #13-04586: Part II Special Terms and Conditions, Reporting Requirements, (D)(1)(a-d), Ohio Administrative Code (OAC) Rule 3745-15-03(C)(1)(a), and Ohio Revised Code (ORC) Section 3704.05(C).

In addition, Tremco, Inc. is in violation of the City of Cleveland's Codified Ordinance Chapters 259.01, and 263.01 for failing to obtain a 2009 city permit-to-operate by submitting city permit fees.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Tremco Inc. electronically submit a corrected 2010 1st Quarter deviation report which identifies the deviation period and the corrective action taken to bring the source into compliance within thirty (30) days of your receipt of this letter.



CDAQ also requests Tremco, Inc. obtain a 2009 city permit-to-operate by submitting city permit fees within thirty (30) days of receipt of this letter to the following address:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

If there is insufficient time to correct the alleged violations within this timeframe, a written response must be received within thirty (30) days of receipt of this letter that includes 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.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Tremco, Inc.: 13-18-00-2813.

Sincerely,

Linda Jimmy for G.B.

George Baker
Chief of Enforcement

GB/BS

cc: Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Glenn Strasshofer, Tremco, Inc.
Facility File and L:\Data\Facilities\1318002813\2010-7-26 NOV.docx

encl: 2009 City Permit Fee Invoices

Cleveland Division of Air Pollution Control
Permit Management Unit, QDR Report
75 Erieview Plaza
Cleveland, Ohio 44114-1839

Re: Quarterly Deviation Report, Facility ID 1318002813
QDR Revision.

Dear Zorica,

This Quarterly Deviation Report (QDR) is for the period (mark appropriate quarter):

- Q1 – January 1st through March 31st 2010
 Q2 – April 1st through June 30th 2010
 Q3 – July 1st through September 30th 2010
 Q4 – October 1st through December 31st 2010

No deviations have occurred during the reporting quarter.

There have been deviations that have occurred during the reporting quarter.

The bag house was operating out of the specified range from March 1 thru March 4, 2010. Readings were 15.00, 9.5, 8.0 and 7.5 respectively during this period. During this period a number of actions were taken in order to bring the unit back into proper operating range. Ultimately, it turned out the blower air inlet baffle had gone out of adjustment and the air blow down lines had accumulated water resulting in ineffective cleaning of the filter cartridges. The lines are now being routinely drained and the baffle is now known adversely impact the operation of the unit.

Regards,

Jimmy Walker
Plant Manager

Tremco Incorporated

3735 Green Road, Beachwood, OH 44122 Tel: 216-292-5000

September 23, 2010

Cleveland Division of Air Quality
Attn: George Baker
75 Ericview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

Re: Notice of Violation for Facility ID 13-18-00-2813

This letter is in response to the Notice of Violation dated August 23, 2010 and received on about August 24, 2010 and addresses the noted violations and corrective actions that have been taken.

Quarter 1, 2010 Quarterly Deviation Report – A corrected Quarter 1, 2010 quarterly deviation report was submitted electronically on September 10, 2010 and is identified as report ID number 24145 in the Air Services section of the OEPA eBusiness Center. The report identifies the deviation that occurred from March 1st through March 4th 2010 along with the causes of the deviation and corrective actions that were taken to abate the deviation. A copy of the report is attached to this letter.

2009 city permit-to-operate and city permit fees – The 2009 City of Cleveland Air Contaminant Source Invoice has been sent via priority overnight deliver via UPS on this day, September 23, 2010, along with the required fees. A copy of the signed invoice, check and mailing receipt is attached to this letter.

If you have any questions or comment please do not hesitate to contact me at 216-766-5673.

Respectfully,



Glenn Strasshofer
Manager of Health, Safety and Environmental Affairs

Cc: Bryan Sokolowski, CDAQ

Enclosures

RECEIVED
SEP 24 2010

Cleveland Division of Air Pollution Control
Permit Management Unit, QDR Report
75 Erieview Plaza
Cleveland, Ohio 44114-1839

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Regards,

Jimmy Walker
Plant Manager



City of Cleveland

Frank G. Jackson, Mayor

Department of Public Health
 Division of Air Quality
 75 Erievue Plaza, Suite 200
 Cleveland, Ohio 44114-1839

SECOND NOTICE

August 23, 2010

2009 City of Cleveland Air Contaminant Source Invoice

TREMCO, Incorporated - MAMECO Division

Facility ID:

13-18-00-2813

Facility Location:

4475 East 175th Street
 Cleveland Ohio 44128

Source	Air Contaminant Source Name and Description	Fee
B001	Gas Fired Boiler - 4.2 MM BTU/HR	\$100.00
B002	Gas Fired Boiler - 4.2 MM BTU/HR	\$100.00
B003	3.6 Mmbtu/Hr Gas/No. 2 Oil-Fired Hot Oil Heater	\$100.00
B004	4.2 Mmbtuh # 2 Oil / Gas / Fired Hot Oil Heater	\$100.00
N/A	Tank #156: 10,000-gallon storage tank for Process Oil	\$50.00
N/A	Tank #157: 1,200 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #158: 1,200 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #159: 3,300 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #160: 3,300 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #161: 1,500 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #162: 2,300 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #163: 3,000 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #164: 1,800 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #165: 2,300 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #166: 2,300 gallon storage tank for varnish intermediate	\$50.00
N/A	Tank #61: 6,000 gallon storage tank for Diisocyanate	\$50.00
N/A	Tank #62: 6,000 gallon storage tank for Polyol	\$50.00
N/A	Tank #63: 6,000 gallon storage tank for Diisocyanate	\$50.00
N/A	Tank #64: 6,000 gallon storage tank for Diisocyanate	\$50.00
N/A	Tank #65: 6,000 gallon storage tank for Plasticizer	\$50.00
N/A	Tank #66: 6,000 gallon storage tank for Polyol	\$50.00
N/A	Tank #67: 6,000 gallon storage tank for Diisocyanate	\$50.00
P004	Kettle 3: 1,000 gallon, blending process	\$12.50
P008	Kettle 12: Non-Asbestos Polyurethane Sealant Line	\$12.50
P009	Kettle 14: Non-Asbestos Polyurethane Sealant Line	\$12.50
P010	Kettle 16 & Kettle 18: Sealant product manufacturing process, 2 dryers, 2 enclosed reactors	\$12.50
P011	Kettle 17 - 2500 gal. blending and holding tank (de minimis - See PTI 13-04586 for info)	\$50.00
P012	Kettle 20: 1,050 gallon, blending and storage vessel with dedicated, boiler fed powder dryer	\$12.50
P013	Kettle 22: 1,050 gallon, blending and storage vessel with dedicated, boiler fed powder dryer	\$12.50
P014	Kettle 6: 1,100 gallon, blending and storage vessel vented to a dust collector and uncontrolled stack	\$50.00
P015	Kettle 7: 1,100 gallon, blending and storage vessel vented to a dust collector and uncontrolled stack	\$50.00

P016	Kettle 8: 1,100 gallon, blending and storage vessel vented to a dust collector and uncontrolled stack	\$50.00
P017	Kettle 10: 1,100 gallon, blending and storage vessel vented to a dust collector and uncontrolled stack	\$50.00
P024	Kettle 24: 1,100 gallon, blending and storage vessel vented to a dust collector and uncontrolled stack	\$50.00
T017	Tank #150: 15,000 - Gal. Heated & Insulated Tank For Resin	\$50.00
T019	Tank #153: 15,000-Gal Storage Tank For High Boiling Alcohol	\$50.00
T020	Tank #152: 15,000 Gallon Tank For Storage Of Asphalt Resin	\$50.00
T021	Tank #29: 1,000 Gallon Storage Tank For Intermediate Blend	\$50.00
T023	Tank #31: 6,000 Gallon Storage For Toluene Di-1 Socyanate	\$50.00
T024	Tank #16: 1,500 Gallon Storage Tank For Varnish Intermediate	\$50.00
T025	Tank #17: 1,500 Gallon Storage Tank For Varnish Intermediate	\$50.00
T026	Tank #18: 1,500 Gallon Storage Tank For Varnish Intermediate	\$50.00
T027	Tank #19: 1,500 Gallon Storage Tank For Varnish Intermediate	\$50.00
T028	Tank #20: 1,500 Gallon Storage Tank For Varnish Intermediate	\$50.00
T029	Tank #21: 1,800 Gallon Storage Tank For Oc Plasticizer	\$50.00
T030	Tank #22: 1,100 Gallon Storage Tank For Varnish Intermediate	\$50.00
T031	Tank #23: 1,100 Gallon Storage Tank For Varnish Intermediate	\$50.00
T032	Tank #24: 1,100 Gallon Storage Tank For Varnish Intermediate	\$50.00
T033	Tank #25: 1,100 Gallon Storage Tank For Varnish Intermediate	\$50.00
T034	Tank #26: 1,100 Gallon Storage Tank For Oc Plasticizer	\$50.00
T035	Tank #27: 1,800 Gallon Storage Tank For Plasticizer	\$50.00
T036	Tank #121: 12,000 Gal. Storage Tank For Aromatic 100	\$50.00
T037	Tank #122: 12,000 Gal. Storage Tank For Xylene	\$50.00
T038	Tank #154: 15,000 Gallon Plasticizer Storage Tank	\$50.00
T039	Tank #30: 3,500 Gallon Intermediate Blending & Storage Tank	\$50.00
T040	Tank #151: 15,000 gallon storage tank	\$50.00
T041	Tank #155: 15,000 gallon storage tank	\$50.00
T043	Kettle 19 - 2500 gal. in process holding tank	\$50.00

Total Fee for Facility:

\$2,875.00

Amount Paid:

13-18-00-2813

By signing this form, I affirm, based on information and belief formed after reasonable inquiry, that all factual statements in this report are true and complete to the best of my knowledge, and that all judgments and estimates provided in this report have been made in good faith. I further affirm that this listing comprises a complete listing of all air contaminant sources at this facility, or that I have enclosed permit application forms addressing all air contaminant sources not listed. I understand that the data provided in this document is used by the City of Cleveland to calculate a fee, which my facility is required to pay under Chapter 263 of the City of Cleveland Health Code.

Signature of Responsible Official:

James F. Walker

2,875.00

Amount Remitted

JAMES F. WALKER

Name (please print)

FOR 2009

Plant Mgr.

Title (please print)

216-378-6325

Phone Number (please print)

Please return this Air Contaminant Source Invoice bearing an original signature as well as any additional permit applications along with the Total Fee for Facility shown above to:

City Permits Section
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, OH 44114 - 1839

Payment must be received
within 30 days:

Funds must be made
payable to:
Treasurer, City of
Cleveland.

THANK YOU!

REMITTANCE STATEMENT - TREMCO INC.
3735 GREEN RD. BEACHWOOD, OH 44122

VENDOR NUMBER

109969

PAID TO		DATE PAID	CHECK NO.	
OUR REFERENCE NUMBER	YOUR REFERENCE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
TREASURER, CITY OF CLEVELAND		09/23/2010	000434513	
19416719	PERMIT FEE	2,875.00	0.00	2,875.00
	Total	2,875.00	0.00	2,875.00

THIS DOCUMENT HAS A GREEN BACKGROUND AND A WATERMARK

TREMCO

An **APM** Company

3735 Green Road, Beachwood, OH 44122

FIRST NATIONAL BANK OF ASHLAND
AN AFFILIATE OF
NATIONAL CITY BANK
CLEVELAND, OHIO

56-389
412

000434513

DATE: 09/23/2010


PAY ONLY **2875.00** SEVEN TWO EIGHT FIVE CTSCTS

PAY **■** TWO THOUSAND EIGHT HUNDRED SEVENTY-FIVE USD and 00/100 *****

*****\$2,875.00

TO
THE
ORDER
OF

109969
TREASURER, CITY OF CLEVELAND
DIVISION OF AIR QUALITY
ATTN: CITY PERMIT SECTION
1925 ST. CLAIR AVENUE
CLEVELAND OH 44114-2080

Michael J. Drummond

AUTHORIZED SIGNATURE

⑈000434513⑈ ⑆041203895⑆ 0081760⑈

443E80 SEP 23, 2010 ACT WT LTR #PK 1
SERVICE 1DA BILL WT LTR
TRACKING# 1Z443E800151998154 ALL CURRENCY USD
ACCOUNTS REC: 91176
REF 2:

HANDLING CHARGE 0.00 FRT: SHP
SHIPMENT PUB RATE CHARGES: SVC 16.91 USD
DV 0.00 COD 0.00 RS 0.00
DC 0.00 DGD 0.00
AH 0.00 PR 0.00 ROD 0.00
TOT PUB CHG 16.91 PUB+HANDLING 16.91