



Louis Stokes
Cleveland Department of
Veterans Affairs Medical Center
10000 Brecksville Road
Brecksville, OH 44141

In Reply Refer To: 541/138(B)

March 24, 2009

City of Cleveland
Division of Air Quality
Attn: Andrew Kenney
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839



Dear Mr. Kenney:

The Louis Stokes Cleveland VA Medical Center is submitting its corrective action plan for the Notice of Violation notification received March 16, 2009 based on the February 19, 2009 CDAQ inspection at the Wade Park facility (Ohio EPA ID# 13-18-00-4330).

In order to deliver quality healthcare to our nation's veterans, we recognize that the need to operate so as to protect both the environment and the health and safety of patients, employees and visitors. Please review the following corrective action plan we are implementing with respect to the violations identified during your visit.

FINDING	REPORT RECOMMENDATIONS	ACTION STEPS	ESTIMATED COMPLETION DATE
1. IAW OACR 3745-31-03(A)(4)(b) and ORC section 3704.05(F) the VAMC Cleveland is in violation for failing to submit permit-by-rule notifications for the four emergency generators.	Submit a permit-by-rule notification form for each generator.	The Green Environmental Management System (GEMS) Coordinator will complete and submit the permit-by-rule notification forms for each generator.	April 20, 2009
2. IAW ORC section 3704.06(C), the VAMC Cleveland is in violation for failing to comply with Permit-to-Operate (PTO)	The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is	The three tanks which supply the boilers were installed in 2007 and filled in 2008. Only one fuel oil delivery has been	April 20, 2009

<p>terms and conditions for emission units B004, B005, and B006. The quarterly reports submitted for fuel oil grab samples indicated that the method used for sulfur and heat content analysis did not meet the specifications with ASTM methods outlined in the PTO and the method used was not approved by the CDAQ.</p>	<p>received for burning in the emissions units for the analysis of sulfur content IAW ASTM methods D4294, D240, or 6010 and IAW ASTM D240 for heat content. Alternative, equivalent methods may be used upon written approval from the CDAQ.</p>	<p>made since then, as we have not burned fuel oil in the boilers since the new tanks were installed and filled. No samples were analyzed for this initial delivery. Will review vendor's (Petroleum Traders) contract to ensure the proper methods are incorporated IAW the permit terms and conditions for future deliveries, or consult with another source, NALCO, for testing. As an initiative to implementing EO 13423, the GEMS Coordinator suggests we begin using ultra low sulfur fuel oil in the future and ensure it is the adequate grade upon delivery.</p>	
<p>3. IAW the Cleveland Codified Ordinance Chapter 263.01 the VAMC Cleveland is in violation for failing to pay city permit fees for 2006, 2007, and 2008 on emission units B004, B005, and B006 (Boilers)</p>	<p>Pay for 2006, 2007 and 2008 City Permit fees (\$3237.50)</p>	<p>Submitted fee invoices to the Facilities Manager on March 16, 2009 to process through acquisition management.</p>	<p>April 20, 2009</p>
<p>4. IAW the Cleveland Codified Ordinance Chapter 263.01 the VAMC Cleveland is in violation for failing to pay city permit fees for the six diesel storage tanks since their installation in 2007, three emergency generators two of which were installed in 2007 and one installed in 2008.</p>			

If you have any questions or require additional information, please contact me at 440-526-3030, ext. 6162.

Sincerely,

A handwritten signature in black ink, consisting of several large, overlapping loops and curves, characteristic of a cursive or stylized signature.

DAVID SABOL
Chief, Engineering Service