



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
1325 St. Clair Avenue  
Cleveland, Ohio 44114 2060  
216/664-2237 • Fax: 216/420-8047  
[www.clevelandhealth.org](http://www.clevelandhealth.org)

**SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7002 2030 0001 1807 8801  
RETURN RECEIPT REQUESTED**

July 11, 2008

Ms. Karen Dethloff, Director,  
Facilities Management  
Metro Health South Campus  
4229 Pearl Road  
Cleveland, Ohio 44109

**FACILITY ID: 1318004343  
NOTICE OF VIOLATION: OPERATING SOURCES WITHOUT A PERMIT-TO-  
INSTALL/OPERATE (PTIO)**

Dear Ms. Dethloff:

On June 19, 2008, the Cleveland Division of Air Quality (CDAQ) visited the Metro Health South Campus located at 4229 Pearl 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.

Metro Health South Campus' operation of two 1500-horsepower emergency electrical generators is in violation of the Ohio Administrative Code (OAC) Rule 3745-31-02 (A) (1) and OAC Rule 3745-35-02 (A), the Ohio Revised Code (ORC) 3704.05 (F) and (G), for operating emission sources without first applying for and obtaining a Permit-To-Install/Operate (PTIO) since January 25, 2006. Forms and instructions may be downloaded at: <http://www.epa.state.oh.us/dapc/files/files.html>

Alternatively, Metro Health South may qualify for and wish to submit a Permit by Rule (PBR) Notification Form in lieu of submitting a PTIO application for the two emergency electrical generators. Forms and instructions may be downloaded at: <http://www.epa.state.oh.us/dapc/permitbyrule.html>

Also, Metro Health South Campus' operation of two 1500-horsepower emergency electrical generators is in violation of the City of Cleveland Ordinance Chapters 257 and 259 for operating emission sources without first applying for and obtaining city air permits since January 25, 2006. The appropriate form is enclosed.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Metro Health South Campus submit PTIO applications or PBR Notifications and city permit



applications for the two 1500-horsepower emergency electrical generators to the following permitting representative:

Mary McGeary  
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.

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 Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Metro Health South Campus: 1318004343.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

GB/LK

cc: Robert Engles, Consultant, Acer Environmental  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L\Data\Facilities\1318004343\2008-07-01NOV.doc

Enc: City of Cleveland Permit Application