



City of Cleveland
Frank C. 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: 7002 2030 0001 1808 9296
RETURN RECEIPT REQUESTED**

April 3, 2009

Mr. Michael Willi
Braden Sutphin Ink Company
3650 East 93rd Street
Cleveland, Ohio 44105

NON-HPV

FACILITY ID: 13-18-00-5785

NOTICE OF VIOLATION : Operating an Emission Unit (EU) without first obtaining a Permit, and failing to pay city permit fees.

Dear Mr. Willi:

On March 20, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Braden Sutphin Ink Company located at 3650 East 93rd 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.

Braden Sutphin Ink Company's, operation of the Ink Tub Washer, is in violation of Ohio Administrative Code (OAC) Rule 3745-31-02 (A)(1)(b), Ohio Revised Code (ORC) Section 3704.05 (G), and City of Cleveland's Codified Ordinances Chapter 257.11(a), for failing to submit Permit-to-Install/Operate (PTIO) Application prior to operating this emission unit. Braden Sutphin Ink Company has been in non-compliance since installation of the emission unit in 2003.

Braden Sutphin Ink Company is also in violation of the City of Cleveland's Codified Ordinance Chapter 263.01 (a)(2), for failing to pay city permit fees for all EU's.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Braden Sutphin Ink Company submit a PTIO Application and an Emission Activity Category Form for the Ink Tub Washer; and submit city permit fees for all EU's for the calendar years of 2006, 2007, and 2008 (invoices, PTIO, and EAC forms enclosed) to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839



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.

The appropriate permit application(s) and supplemental form(s) are included with this letter. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA facility identification number for Braden Sutphin Ink Company: 13-18-00-5785.

Sincerely,

Valencia White

Field Enforcement Manager, CDAQ

VW/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318005785\2008-3-20 NOV.docx

encl: PTIO Application, EAC Form, and City of Cleveland – Permit Fee Invoices