



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 : 7002 2030 0001 1807 9785  
RETURN RECEIPT REQUESTED

July 23, 2009

Robert Wolf  
Springco Metal Coating  
12500 Elmwood Avenue  
Cleveland, Ohio 44111

NON-HPV

FACILITY ID: 13-18-00-5888

**NOTICE OF VIOLATION :** Operating Emission Units (EU) without first obtaining a permit-to-install/operate (PTIO), failing to pay city permit fees, failure to maintain proper monitoring and recordkeeping requirements, failure to submit deviation reports

Dear Mr. Robert Wolf:

On June 16, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Springco Metal Coating located at 12500 Elmwood Avenue 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.

Springco Metal Coating's operation of Burn-off Ovens PTR-588, PTR-565, and PTR-549, are in violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(b), Ohio Revised Code (ORC) Section 3704.05 (F), and City of Cleveland's Codified Ordinances Chapter 257.11(a), for failing to submit PTIO applications prior to operating these emission units.

Springco Metal Coating's operation of emission units N002: #2 Burn-off oven, N003: #3 Burn-off oven, and N005: #5 Burn-off oven (N002, N003, and N005) are in violation of PTI #13-03791, Part II – Special Terms and Conditions (A)(2)(c), and ORC Rule 3704.05(C) for failing to be serviced every 6-months by a qualified incinerator contractor;

And, Part II: Special Terms and Conditions (B) for failing to maintain the following Operational Restrictions:

1. This incinerator shall be operated only by adequately instructed personnel
2. Ashes shall be removed from the primary chamber on a daily basis



3. The afterburner chamber shall be inspected and cleaned monthly;

And, Part II – Special Terms and Conditions (C), OAC Rule 3745-31-02(A)(1)(c)(i), and ORC Rule 3704.05(C) for failing to maintain the following monitoring and recordkeeping requirements:

The permittee shall collect and record the following information each day:

- a. The batch operating times for the Emission Unit
- b. A log recording the date and the name of the person who removed the ashes
- c. The temperature of the secondary chamber
- d. Copies of contractor's invoices of maintenance and repairs shall be maintained on site

And Part II: Special Terms and Conditions (D) for never submitting quarterly deviation reports.

Also, Annual Volatile Organic Compound (VOC) emission reports and quarterly deviation reports for EU K001 have not been submitted which is in violation of PTI # 13-03823, Part II – Special Terms and Conditions (D)(2) and (D)(3), and ORC Rule 3704.05(C).

In addition, Springco Metal Coating is in violation of the City of Cleveland's Codified Ordinance Chapter 236.01(a)(2), for failing to pay 2006-2009 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 Springco Metal Coating submit city permit fees within two weeks to CDAQ at the following address:

City Permit Fees  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

CDAQ also requests that Springco Metal Coating submit PTIO applications and Emission Activity Category (EAC) forms for Burn-off Ovens PTR-588, PTR-565, and PTR-549 within 30 days to the following CDAQ representative:

David Hearne  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839



CDAQ also requests the following from Springco Metal Coating:

1. Begin submitting quarterly deviation reports for EU's K001, N002, N003, and N005, starting with the 3<sup>rd</sup> quarter of 2009, due no later than October 31, 2009, that covers the previous calendar quarter
2. Begin submitting an Annual VOC emission report for EU K001 starting with 2009, due no later than March 31, 2010
3. Submit a sample of the following monitoring and recording keeping requirements for EU N002, N003, and N005 within 14 days of receipt of letter:
  - a. The batch operating times
  - b. A log recording the date and the name of the person who removed the ashes
  - c. The temperature of the secondary chamber
4. Submit a maintenance invoice showing EUs N002, N003, and N005 being serviced by a qualified incinerator contractor; and thereafter, every 6 months

Please send the above items to:

Bryan Sokolowski  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> 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.

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 Springco Metal Coating: 13-18-00-5888.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker  
Chief of Enforcement

GB/BS |K

cc: John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318005888\2009-6-16 NOV.docx

encl: City Fee Invoices for 2006-2009