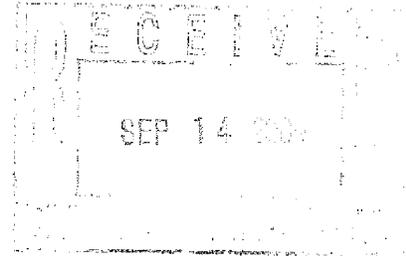




August 26, 2009

Bryan Sokolowski  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114

Facility ID: 13-18-00-5888



Dear Mr. Bryan Sokolowski:

This letter is in response to the Notice of Violation dated July 23, 2009.

At present, every available attempt is being performed to gather the pertinent information needed to complete the PTIO for Burn-off ovens PTR-588, PTR-565 and PTR-549. When this is complete, the finalized report will be expedited. Robin Jarjabka will be meeting with Adrienne Lafavre from OCAPP on September 16, 2009 to look over the PTIO for these units.

In reference to the other units, N002, N002 & N004, all training and inspection of the latter are performed in house. Maintenance personnel that service and operate the aforementioned units complete preventative maintenance on a weekly basis; attached are copies of their most recent individual logs. Also, operation of the units is limited to qualified maintenance personnel and a select number of employees authorized; list of names attached. As represented within that list, the employee exposure is very limited and select.

When speaking to maintenance on/of the Burn-off ovens, this is solely limited to the maintenance personnel of Springco; a third party is not employed. Attached is the log sheet that will be used, going forward, for monitoring and record-keeping requirements.

Furthermore, the Burn-off ovens in use at Springco are not incinerators nor are they used as such. In reference from Pollution Control Products booklet, it states "**Controlled Pyrolysis Burn-Off Furnaces are not incinerators. The furnace should be used only to reclaim metal parts for salvage and/or rebuilding by removing conventional hydrocarbon coatings (paint/powder coatings, oil/grease coatings) from metal parts.**" This clearly explains the use of the oven is not for that of incinerating but to strip the parts. Attached is the reference material provided by Pollution Control Products.

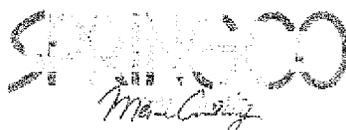




According to our permit for K001 it states, " The permittee shall submit to the Cleveland BAPC an annual emissions report including the VOC emissions for the coating line. This report shall be submitted no later than the end of the first quarter following the previous calendar year." (D3)

If you need anymore information please feel free to contact me at 216-941-0020 x 130, or by e-mail [rwolf@springco-coatings.com](mailto:rwolf@springco-coatings.com).

Robert E. Wolf  
Vice President Plant Maintenance & Engineering



MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: \_\_\_\_\_ DATE: 8-19-09  
TIME IN: \_\_\_\_\_ TIME OUT: \_\_\_\_\_  
BREAK TIME: \_\_\_\_\_ LUNCH TIME: \_\_\_\_\_

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) PM Rock Bean Factory spec / SOP - 3-6
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_
- 6) \_\_\_\_\_
- 7) \_\_\_\_\_
- 8) \_\_\_\_\_
- 9) \_\_\_\_\_
- 10) \_\_\_\_\_
- 11) \_\_\_\_\_
- 12) \_\_\_\_\_
- 13) \_\_\_\_\_
- 14) \_\_\_\_\_

\*\*LIST ALL SUPPLIES USED ON THE JOB: \_\_\_\_\_

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_

\*\* LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

**\*\*\* THIS SHEET MUST BE TURNED IN DAILY \*\*\***







MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: \_\_\_\_\_ DATE: 7-30-09  
TIME IN: \_\_\_\_\_ TIME OUT: \_\_\_\_\_  
BREAK TIME: \_\_\_\_\_ LUNCH TIME: \_\_\_\_\_

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) PM Rock Burn Factory spec / scf 3-6
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_
- 6) \_\_\_\_\_
- 7) \_\_\_\_\_
- 8) \_\_\_\_\_
- 9) \_\_\_\_\_
- 10) \_\_\_\_\_
- 11) \_\_\_\_\_
- 12) \_\_\_\_\_
- 13) \_\_\_\_\_
- 14) \_\_\_\_\_

\*\*LIST ALL SUPPLIES USED ON THE JOB: \_\_\_\_\_

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_

\*\* LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

**\*\*\* THIS SHEET MUST BE TURNED IN DAILY \*\*\***

MAINTENANCE TIME SHEET

NAME: Bob Wolf SHIFT: \_\_\_\_\_ DATE: 7-30-09

TIME IN: \_\_\_\_\_ TIME OUT: \_\_\_\_\_

BREAK TIME: \_\_\_\_\_ LUNCH TIME: \_\_\_\_\_

JOB NUMBER AND DESCRIPTION START TIME FINISH TIME TOTAL TIME

- 1) PM Rack Burner Per SOP 1-3
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_
- 6) \_\_\_\_\_
- 7) \_\_\_\_\_
- 8) \_\_\_\_\_
- 9) \_\_\_\_\_
- 10) \_\_\_\_\_
- 11) \_\_\_\_\_
- 12) \_\_\_\_\_
- 13) \_\_\_\_\_
- 14) \_\_\_\_\_
- 15) \_\_\_\_\_

**\*\*LIST ALL SUPPLIES USED ON THE JOB:** \_\_\_\_\_

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

**\*\* LIST ANY PROBLEMS ON ANY JOB: (USE THE BACK OF THIS SHEET IF YOU NEED TO)** \_\_\_\_\_

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

# Memorandum

To: All managers, all large line foremen, and all assigned rack burner employees.

CC: Paul Springer, and Bob Wolf.

From: Jim Sheffield.

Date: 5/6/09

Re: Rack burner abuse, and foremen supervision required while loading all burners effective Wednesday 5/6/09.

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To all receiving this memo,

I am absolutely disgusted with the constant abuse that our "assigned" rack burner employees are causing to all of our rack burners on a daily basis! 2 months ago, we assigned only a select number of employees to do the rack burners around the clock in order to get racks burnt, and get the job done without destroying our rack burning equipment! In this last 2 months, not a day goes by in which I do not get a report that a rack burner has had the walls tore out of it, or that a rack burner has had a water line tore out of it, or that the insulation has been completely tore out of the burner. This is absolutely a total disrespect of company property! What is wrong with you people? Do you not understand that the rack burners are the HEART BEAT of our operation? Without the rack burners, we create rejects, and miss shipments, all consequences in which effect the few customers that we have left in order to keep our doors open for business!!! To refresh everybody's memory as to the employees that we assigned to do rack burners, they are as follows,

Third shift – Dave Kent

First shift = Paul Bartel, Shawn Shea, and Will King

Second shift = Mark Bazdar

Now that everybody is updated on the list of employees who are approved to do the rack burners around the clock, why do I constantly see a host of other employees that are loading, and unloading the rack burners? POOR SUPERVISION, THAT IS WHY!!!

Effective immediately, the approved employees listed above will be the only employees allowed to load, and unload the burners. Furthermore, effective immediately, when it is time to load, or unload a burner, the above listed employees are to get the foreman on duty for their shift to stand by the burner, and supervise the whole operation until the burner is unloaded, and reloaded to assure that no abuse occurs to the burners. I have made an in house report that I want signed off on by each foreman, and turned in with their FOD reports daily. Any abuse that happens in the future in which the foreman on duty is to report, the responsible employee will be terminated, no exceptions! If rack burner abuse happens on a shift, and is not reported

September 11, 2009

by a foreman, I will assume that the on duty foreman did not supervise the operation, and that on duty foreman, and the rack burner employee will be terminated, no exceptions! I am exhausted daily knowing that all of this abuse is taking place, and know body ever knows who did it. You will all now start being held accountable for your actions! Start using care in your jobs; these rack burners are not only an essential part of our business, they are very expensive, and time consuming to fix! The attached report to this memo is to be started by the on duty rack burner prior to starting a burner cycle, and it will be signed off on for each rack burning cycle by the on duty foreman who will turn this report in daily to Jim Sheffield with their FOD reports. Do not forget to turn this report in, and do not cover employees when they cause abuse to company property, because I will not tolerate both violations any longer! I will get to the bottom of this problem, and it will go away, period! We can no longer afford this to go on as a company!

Thank you all for your cooperation in this serious matter,

Jim Sheffield

5/6/09

## 1.3 WHAT THE CLEANING FURNACE SHOULD NOT BE USED FOR.

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Parts such as drip racks, spray booth gratings, etc., that have dangerous or excessive amounts of uncured paint on them must not be pyrolyzed in this furnace until the paint has been cured by putting the parts through a bake oven to evaporate the solvent in the uncured paint. **Do not use the furnace for curing of varnished or painted parts, or other parts which may contain large amounts of volatile solvents. Do not use the furnace for processing parts with uncured paint on them.** This furnace does not have a forced exhaust (because of high temperatures involved in pyrolysis) so it cannot handle excess amounts of solvents that may evaporate at less than 400°F (200°C). Such solvent vapors may fill the furnace at or near room temperature with an explosive mixture which can be ignited when the furnace is turned on. Alternatively, the rapid evolution of such vapors during initial heat-up of the furnace may overwhelm the capacity of the afterburner and lead to a fire in the furnace or exhaust stack.

Controlled Pyrolysis<sup>®</sup> Burn-Off Furnaces **are not incinerators**. The furnace should be used only to reclaim metal parts for salvage and/or rebuilding by removing conventional hydrocarbon coatings (paint/powder coatings, oil/grease coatings) from metal parts. **Do not use the furnace as an incinerator to dispose of waste materials or medical or pathological or nuclear materials.**

**DANGER:** Do not clean any sealed container, pipe, tank, or other vessel containing any material which may expand when heated and rupture the vessel. This includes water-jacketed stators, heat exchangers, coolers, oil-jacketed pipes, or any other sealed vessel. Plugs, caps, or seals must be removed to prevent explosive forces from rupturing the vessel, destroying the furnace, destroying the building, and injuring or killing people.

Do not process wet paint, paint sludge, waste powder from powder coating operations, paint filters, nitrocellulose paints, solvents, thinners, waste plastic or polymer, PVC (polyvinyl chloride), lead or rubber coated scrap wire or parts, wood, paper, trash, waste oil, waste grease, oil filters, ammunition, explosives, fertilizer, or anything else which may overload the furnace and cause a fire or explosion. The furnace is not designed as an incinerator. It is designed to clean and reclaim metal parts.

