



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Second Floor  
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 7006 0810 0002 4654 0447  
RETURN RECEIPT REQUESTED**

October 27, 2011

Jake Youngman  
Bulldog Asset Recovery and Collection, LLC  
5850 West Canal Rd.  
Valley View, OH 44125-3327

**NON-HPV**

**FACILITY ID: n/a**

**NOTICE OF VIOLATION: operating a sources of air pollution without submitting a permit-to-install/operate application**

Dear Mr. Youngman:

On October 17 and 24, 2011, the Cleveland Division of Air Quality (CDAQ) inspected Bulldog Asset Recovery and Collection, LLC d.b.a. West Canal Street Material Handling (West Canal Street Material Handling) located at 5850 West Canal Road in Valley View. CDAQ inspected your activities on West Canal Street during the course of a complaint investigation. The complaint was about excessive dust. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

West Canal Street Material Handling's operation of unpaved plant roadways and parking lots, material storage piles and a portable screen plant is in violation of Ohio Administrative Code Rule 3745-31-02(A) and Ohio Revised Code (ORC) Sections 3704.05(F) and (G). West Canal Street Material Handling has been operating these emissions units (EUs) since March 29, 2011 without submitting permit-to-install/operate (PTIO) applications and emissions activity category (EAC) forms as required by state rules.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that West Canal Street Material Handling submit PTIO applications and EAC forms to the following address:

Permit Section  
Cleveland Division of Air Quality  
75 Erieview Plz., Fl. 2  
Cleveland, Ohio 44114-1839



Your written response to this letter must be received by CDAQ within 30 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 and supplemental forms 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.

PTIO applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in ORC Section 3704.99(A), which allows fines of not more than \$25,000 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.ohio.gov/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. If you have any questions, please call David Wagner at 216/664-3004.

Sincerely,

Linda Kimmy  
Field Enforcement Manager

LK/dlw

cc: George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
Facility File and L:\Data\Facilities\Unassigned\Bulldog Asset Recovery\2011-10-17 NOV.docx

**SENDER- COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

NOV  
Jake Zingone  
Bullseye Post Office  
5850 WEST CAVALER  
VALLEY VIEW, OH 44125

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X



- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

10/27/11

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. 7006 0810 0002 4654 0447