



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Suite 200  
Cleveland, Ohio 44114-1839  
216/661-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 5465  
RETURN RECEIPT REQUESTED

April 16, 2010

Rachel Vocaire  
Continental Airlines, Inc.  
5300 Riverside Dr. CLEEN  
Cleveland, OH 44135

FACILITY ID: 13-18-00-6015  
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Ms. Vocaire:

On March 18, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Continental Airlines, Inc. to submit a corrective action plan stating how you will continue to not exceed the 3.5 pound per gallon VOC limitation on K001: GSE Paint Booth until and if the administrative modification request is granted. CDAQ is in receipt of the corrective action plan dated April 16, 2010.

The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and 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 Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for Continental Airlines, Inc.: 13-18-00-6015.

Sincerely,

*Linda Kimmerly for G.B.*  
George Baker  
Chief of Enforcement, CDAQ

GB/AM

cc: Sarah Rehner, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318006015\2010-3-12 NEAR.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:

Rachel Vocaire  
 Continental Airlines, Inc.  
 5300 Riverside Dr. CLEEN  
 Cleveland, OH 44135

2. Article Number

*(Transfer from service label)*

7003 1010 0004 2923 5465

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Catherine A. Attkins*  Agent  
 Addressee

B. Received by (*Printed Name*)

C. Date of Delivery

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.

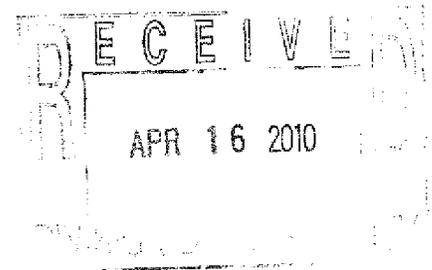
4. Restricted Delivery? (*Extra Fee*) Yes

**VIA OVERNIGHT MAIL**

April 15, 2010

Andrew Marantides  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, OH 44114  
(216) 420-8049

**RE: NOTICE OF VIOLATION  
CORRECTIVE ACTION PLAN SUBMITTAL  
FACILITY ID 13-18-00-6015  
PERMIT NUMBER P0094509  
CLEVELAND HOPKINS INTERNATIONAL AIRPORT  
CONTINENTAL AIRLINES, INC.**



Dear Mr. Marantides:

Continental Airlines, Inc. (Continental) is submitting the following corrective action plan as requested from the Notice of Violation letter dated March 18, 2010 and received on March 26, 2010 from the Cleveland Division of Air Quality (CDAQ). The corrective action is related to the Permit to Install and Operate for GSE paint booth number P0094509 located at facility ID 13-18-00-6015.

Continental has been engaged in corrective actions relating to the 3.5 pound per gallon volatile organic compounds (VOC) daily volume-weighted average since October 2009. Corrective actions have included altering the coatings used during painting operations as well as requesting a modification to our permit. Continental currently has an annual VOC limit of 6.6 tons per year (tpy) with actual emissions in 2008 being 0.18 tpy VOC and 0.15 tpy VOC in 2009.

Due to the low volume of painting that actually occurs, coatings in the GSE paint booth have been limited to coatings with a VOC content of less than 3.5 pounds per gallon and operational restrictions that do not exceed the daily volume-weighted average of 3.5 pounds per gallon VOC. All new coatings must be approved by the environmental department to ensure that their application will meet the 3.5 pound per gallon VOC daily volume-weighted average.

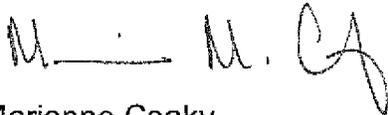
There have not been any permit non-compliances of the 3.5 pound per gallon VOC daily volume-weighted average since October 16, 2009

Additionally, on October 28, 2009, Continental requested that the 3.5 pound per gallon VOC daily volume-weighted average permit condition be changed to the exemption stated in OAC Rule 3745-21-09(B)(3)(b), that combined total emissions are less than 15 pounds of VOCs per day. This change was requested to better suit our very low volume of coating usage. A decision regarding this request has not yet been made by the CDAQ.

Continental understands that until an amended permit is issued, the GSE paint booth must be operated under the conditions of the existing permit.

If you have any questions or require additional information, please do not hesitate to contact Rachel Vocaire at (216) 501-4859.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Csaky". The signature is written in a cursive style with a horizontal line under the first "M".

Marianne Csaky  
Director, Environmental Affairs  
Continental Airlines, Inc.

Cc: Rachel Vocaire