



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
1925 St. Clair Avenue  
Cleveland, Ohio 44114-2080  
216/664-2297 • Fax: 216/420-8017  
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 70031010000429233614  
RETURN RECEIPT REQUESTED

March 12, 2008

Mr. Otto Kacr  
Service Cleaners  
3385 West 105<sup>th</sup> Street  
Cleveland, OH 44111

FACILITY ID: 13-18-00-6535  
Notice of Violation: Monitoring and Recordkeeping Requirements

Dear Mr. Kacr:

On March 11, 2008, the Cleveland Division of Air Quality (CDAQ) inspected Service Cleaners located at 3385 West 105<sup>th</sup> 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.

Service Cleaner's operation of emission unit (EU) D001 is in violation of the Ohio Administrative Code (OAC) Rule 3745-21-09 (AA), Title 40 of the Code of Federal Regulations (CFR) Part 63 Subpart M, and the Ohio Revised Code (ORC) 3704.05 (C) & (G).

During the compliance inspection, CDAQ discovered that bi-weekly maintenance check sheets have not been kept since December, 2006. This is a violation of OAC Rule 3745-21-09 (AA), perchloroethylene dry cleaning facility, which provides the following:

- (3) Compliance with paragraph (AA)(1)(e) of this rule shall be determined by means of visual inspection of the following components:
- (a) Hose connections, unions, couplings, and valves;
  - (b) Machine door gaskets and seatings;
  - (c) Filter head gasket and seating;
  - (d) Pumps;
  - (e) Base tanks and storage containers;
  - (f) Water separators;
  - (g) Filter sludge recovery;
  - (h) Distillation unit;
  - (i) Diverter valves;
  - (j) Saturated lint from lint basket; and
  - (k) Cartridge filters.



(4) Each owner or operator of a perchloroethylene dry cleaning facility shall maintain the following records in a readily accessible location for at least three years and shall make these records available to the director or an authorized representative of the director at any reasonable time:

(b) A record of the results of visual leak inspections conducted in accordance with paragraph (AA) (3) of this rule.

This is also a violation of Title 40 CFR Part 63.324 Reporting and Recordkeeping Requirements, which provide the following:

(3) The dates when the dry cleaning system components are inspected for leaks, as specified in section 63.322 Standards (k) (l):

(k) The owner or operator of a dry cleaning system shall inspect the system weekly for perceptible leaks while the dry cleaning system is operating. Inspection with a halogenated hydrocarbon detector or PCE gas analyzer also fulfills the requirement for inspection of perceptible leaks. The following components shall be inspected:

1. Hose and pipe connections, fittings, couplings, and valves;
2. Door gaskets and seatings;
3. Filter gaskets and seatings;
4. Pumps;
5. Solvent tanks and containers;
6. Water separators;
7. Muck cookers;
8. Stills;
9. Exhaust dampers;
10. Diverter valves; and
11. All filter housings.

(l) The owner or the operator of a dry cleaning facility with total facility consumption below the applicable consumption levels of section 63.320 (d) or (e) shall inspect the components listed in paragraph (k) of this section biweekly for perceptible leaks while the dry cleaning system is operating.

In addition, Service Cleaners is in violation of the ORC 3704.05 (C) & (G) Prohibited Acts, which provides the following:

(C) No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Ohio Revised Code shall violate any of its terms and conditions.

(G) No person shall violate any order, rule, or determination of the director issued, adopted, or made under this chapter.



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests submittal of a corrective action plan showing how Service Cleaners will record bi-weekly visual inspections and provide a copy of a completed bi-weekly maintenance check sheet, which contain any repairs, perchlorethylene usage calculations, and the amount of clothes cleaned to the following enforcement representative:

Linda Kimmy  
Cleveland Division of Air Quality  
1925 St. Clair Avenue NE  
Cleveland, Ohio 44114-2080

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 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 the OCAPP.

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 Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for Service: 1318006535.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

GB/LK

cc: John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318006535\2008-03-12 NOV

**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: — 00-6535  
SERVICE CLEANERS  
ATTN: MR. OTTO KACK  
3385 W. 105th Street  
CLEVELAND, OH 44111

1318 00 6535

2. Article Number  
(Transfer from service label)

7003 1010 0004 2923 3614

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
X *Otto Kack*  Addressee

B. Received by (Printed Name) C. Date of Delivery  
OTTO KACK 3-20-00

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