



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2060
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7001 2510 0006 1130 7363
RETURN RECEIPT REQUESTED

February 24, 2009

Frank Geraci
Erievew Metal Treating Company
4465 Johnston Parkway
Cleveland, OH 44128

NON-HPV

FACILITY ID: 13-18-00-7275

NOTICE OF VIOLATION: Failure to comply with terms and conditions of permits, failure to submit required reports, and failure to pay city permit fees

Dear Mr. Geraci:

On February 5, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Erievew Metal Treating Company (Erievew) located at 4465 Johnston Parkway 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.

During the inspection, Erievew informed CDAQ that Apex Metal Finishing Company (Apex), previously located at the same address, was merged into Erievew on December 31, 2003. Therefore, Ohio EPA has withdrawn Apex's facility identification number of 13-18-00-8160 effective December 31, 2003 and merged Apex's Emissions Unit (EU) K001 into Erievew's facility identification number of 13-18-00-7275. Erievew is required to submit a Permit to Install/Operate (PTIO) renewal application for this EU.

Erievew's EUs K002 and K003: Coating lines with ovens for miscellaneous metal parts are operating in violation of Ohio Revised Code (ORC) 3704.05(C) and Permit to Install (PTI) #13-1329 and PTI #13-03990, respectively, for failing to perform daily and monthly recordkeeping requirements. Erievew is also in violation of ORC 3704.05(D) for failing to submit quarterly deviation reports for K003. In addition, Erievew has not paid city permit fees for calendar years 2006, 2007, or 2008, which is a violation of the City of Cleveland's Codified Ordinance 257.01(a).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Erievew submit the following:



- City permit fees for calendar years 2006 through 2008 (invoices enclosed)
- A copy of a new daily recordkeeping log template for EUs K001 (formerly Apex), K002, and K003
- A quarterly deviation report for K003 (4th quarter of 2008 as well as every quarter moving forward)
- PTIO renewal applications for EUs K001 (formerly Apex), K002, and K003 to reflect current processes (located online at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>)
- Emission calculations for EUs P001: Zinc phosphate automatic barrel plating line, P005: Zinc automatic barrel plating line, P006: Zinc nickel automatic barrel plating line, P007: Electroless nickel automatic barrel plating line, and L001: Cleaning line
- An initial notification form and notification of compliance status report (sample template enclosed) for Code of Federal Regulations Title 40 Part 63 Subpart WWWW, which applies to P001, P005, P006, and P007 (links to sample templates located at <http://www.epa.gov/ttn/atw/gp/gppg.html>)
- An initial notification form and notification of compliance status report (sample template enclosed) for Code of Federal Regulations Title 40 Part 63 Subpart MMMM, which applies to K001 (formerly Apex), K002, and K003 (links to sample templates located online at <http://www.epa.gov/ttn/atw/gp/gppg.html>)

The information requested above shall be sent to the following enforcement representative:

Andrew Marantides
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within thirty (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(s) and supplemental form(s) can be found online at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>. 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.

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.

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 Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for Erieview Metal Treating Company: 13-18-00-7275.

Sincerely,

Valencía White
Field Enforcement Manager, CDAQ

VW/AM

cc: Mary McGeary, CDAQ
Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007275\2-5-2009 NOV.docx

encl: - City permit fee invoices for 2006, 2007, and 2008
- Initial notification forms for Code of Federal Regulations Title 40 Part 63 Subparts MMMM and WWWW (sample template) (located online at <http://www.epa.gov/ttn/atw/gp/initialvf.pdf>)
- Notification of compliance status reports for Code of Federal Regulations Title 40 Part 63 Subparts MMMM and WWWW (sample template) (located online at http://www.epa.gov/ttn/atw/gp/nocsvf6_30_03.pdf)

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, & 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.

Article Addressed to:

Frank Geraci
Erievue Metal Treating Co.
1465 Johnston Parkway
Cleveland, OH 44128

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature] Agent Addressee

B. Received by (Printed Name) C. Date of Delivery

GEORGIA KARADINIS 2/27/93

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee) Yes

Article Number

(Transfer from service label)

7001 2510 0006 1130 7363

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1465 Johnston Parkway
Cleveland, OH 44128

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X [Signature] Addressee

B. Received by (Printed Name) C. Date of Delivery
GEORGIK KAPADIMIS 9/27/93

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

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