



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7001 2510 0006 1130 7837
RETURN RECEIPT REQUESTED

April 13, 2009

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

FACILITY ID: 13-18-00-7275

RECEIPT OF CORRECTIVE ACTION PLAN: 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 24, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Erieview Metal Treating Company pay city permit fees, create a new daily recordkeeping log template for K001, K002, and K003; submit a quarterly deviation report for K003; submit PTIO renewal applications for K001, K002, and K003; submit emissions calculations for P005, P006, P007, and L001; submit an initial notification form and notification of compliance status report for 40 CFR 63 Subpart WWWW which applies to P001, P005, P006, and P007; and submit an initial notification form and notification of compliance status report for 40 CFR 63 Subpart MMMM which applies to K001, K002, and K003. CDAQ is in receipt of a Scope of Services with a timeline from T.D. Kmiec & Associates dated April 9, 2009. You are expected to comply with the Scope of Services and timeline by July 9, 2009. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action.

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 Erieview Metal Treating Company: 13-18-00-7275.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

VW/AM

cc: Thomas D. Kmiec, J.D., P.E., T.D. Kmiec & Associates
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007275\4-9-2009 RCAP.docx

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 4. Also complete item 3 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
Interview Metal Treating Co.
465 Johnston Parkway
Cleveland, OH 44128

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
X Georgina Karadima

B. Received by (Printed Name) C. Date of Delivery
GEORGINA KARADIMA 3/2/19

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) **7006 2760 0000 3705 2630**

***T.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826***

Phone (440) 449-4720 FAX (440) 449-2827

April 09, 2009

Andrew N. Marantides
Cleveland Division of Air Quality (CDAQ)
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

RE: Notice of Violation dated February 24, 2009 (Received February 27, 2009)
Erieview Metal Treating Company: Facility ID: 13-18-00-7275

Dear Mr. Marantides:

I am submitting this letter on behalf of Erieview Metal Treating Company (Erieview) in response to this subject CDAQ Notice-of-Violation dated 02/24/09; Received 02/27/09.

This letter will define a Scope-of-Services for the Bullet Items on Page 2, including a proposed Time Line to complete each Task. For clarity, I have numbered the Bullet Items 1 through 7.

Item 1: Permit Fees for the Calendar Years of 2006 through 2008:

It is my understanding that these fees have been paid-in-full.

Time Line to Complete: This Item has been completed.

Item 2: A Copy of the New Daily Recordkeeping Log Template for K001; K002 and K003:

Enclosed is a sample page of a Coating Line Addition Log (see Attachment 1). This sample is typical for all three (3) Coating Lines.

Time Line to Complete: This Item is completed.

Item 3: Quarterly Deviation Report for K003: 4th Quarter of 2008 and every quarter thereafter

Task 1 Review the general Permit Terms & Conditions to determine (1) emission limitations, (2) operational restrictions, (3) control device operating parameter limitations. **NOTE:** If the Permits are not readily available, a Freedom-of-Information request will be made to the CDAQ in order to obtain copies. This would add time to the completion of this Task.

Task 2 Review other specific permit Terms & Conditions, if applicable.

Task 3 Review the operation of the EU including, but not necessarily limited to, (1) Coating Identification, (2) coating composition (as applied), (3) coating MSDS's, (4) solvent MSDS's, (5) Coating/Solvent Mix Ratios, if applicable, (6) coating consumption, (7) operating schedule and (8) etc.

Task 4 Compare the operational information and records in light of the Permit Terms & Conditions to determine if a reportable deviation has occurred.

Task 5 Prepare Quarterly deviation reports, as required, for submission to CDAQ.

Time Line to Complete:

Item 4: Prepare Applications for the Renewal of the OEPA PTIO for EU's K001, K002, and K003.

Task 1 The information obtained in **Item 3** above would be used in the preparation of the Applications for the Renewal of the OEPA/PTIO for EU's K001, K002 and K003.

Task 2 Obtain additional information about current operation of these three (3) EU's, including operating schedules, as required to complete the PTIO Application form.

Task 3 Prepare the PTIO Application Forms with Emission Activity Category (EAC) Forms and support information for submission to the CDAQ..

Time Line to Complete:

Item 5: Prepare Emission Calculations for the following Emission Units:

P001 - Zink 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.

NOTE: The Tasks below are typical for all of these lines!

Task 1 Review the operations of each line considering (1) composition of materials use, (2) quantity of the materials used, (3) operating schedules (4) operational parameters (such as, temperature, agitation, foam suppression, fume control by using surfactants, etc).

Task 2 Review available Published Emission Factors such as (1) USEPA/AP-42, (2) USEPA- "Air Pollution Engineering Manual" Second Edition (AP-40), (3) NAMF Report, "Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry", and (4) Other Reference Documents.

Task 3 Calculate the projected emissions and Potential Emissions from these EU's using all of the information above and sound engineering judgement.

Task 5 Prepare a Final Report, with supporting documentation, with the results of the calculations for the type and amount of emissions.

Item 6: Initial Notification Form and Notification of Compliance Status Report: - WWWWWW:

Task 1 Review the regulation Published at 40 CFR Subpart WWWWWW in light of the manufacturing operations of EU's P001, P005, P006 and P007 to determine to which EU, if any, does this regulation apply.

Task 2 Prepare the Notification Form and Notification of Compliance Status Report for submission to the CDAQ, as required, or, in the alternative, prepare a report, with supporting documentation, to explain why these Notifications are not required..

Item 7: Initial Notification Form and Notification of Compliance Status Report: - MMMM:

Task 1 Review the regulation Published at 40 CFR Subpart MMMM in light of the operations of EU's K001, K002 and K003 to determine to which EU, if any, does this regulation apply.

Task 2 Prepare the Notification Form and Notification of Compliance Status Report for submission to the CDAQ, as required, or, in the alternative, prepare a report, with supporting documentation, to explain why these Notifications are not required..

Do not hesitate to contact me at the letterhead address or at (216) 314-6001 (preferred) or at (440) 449-4720 if you have any questions.

Thank you for your cooperation.

Very truly yours,



Thomas D. Kmiec, J.D., P.E.
Professional Engineer

cc: Frank Geraci/Erievue Metal Treating w/o Enclosures
Valencia White/Field Enforcement Manager/CDAQ w/o Enclosures

Coating Line II Addition Log

Date	Time	Coating Added	Amount Added in Gallons	Add Made By
3/3/09	7:10	440 Reducer	1 1/2 gal	PC
3/3/09	2:00	Black 18	1 gal red.	PC/58
3/4/09	7:40	Plus	3 gal	qi
3/4/09	10:30	Plus L	5 gal	qi
3/5/09	7:15	Blue BK ML	5 gal	qi
3/6/09	7:15	Black Plus	2 1/2 gal	qi
3/6/09	11:00	Plus	3 gal	qi
3/10/09	12:00	BOAT - SE	2 1/2 gal	qi
3/10/09	1:20	440 BK red.	1 1/2 gal	qi
3/11/09	9:30	440 BK 440 red.	2 gal 1 1/2 gal	qi
3/13/09	1:00	440 red.	1 gal	qi
3/14/09	2:00	Plus	3 gal	qi
3/16/09	8:00	Plus 1	2 gal	qi
3/17/09	9:30	Plus LMC	3 gal	qi
3/17/09	10:55	Plus MC	2 gal	qi
3/17/09	2:00	Plus 1 MC	3 gal	qi
3/18/09	9:30	440 BK red.	2 1/2 gal	qi
3/18/09	10:00	Black 440 440 Reducer	3 gal 2 gal	qi
3/18/09	10:45	Black Plus ML	5 gal	qi
3/19/09	8:00	Plus L	2 gal	qi
3/23/09	9:55	Black Plus L	3 gal	qi
3/23/09	1:00	Black 440 red. Black 440	2 gal 1 gal	qi
3/24/09	7:30	Reducer 440	2 gal	qi
3/24/09	2:00	BPML	10 gal	qi

Form 2799 Rev: None

ATTACHMENT 1

<i>NOTE: The Calendar starts after receipt of a PO from the Client</i>													90 Days													180 Days												
WEEK NUMBER → ACTION ITEM ▼	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26												
Item 1	COMPLETED																																					
Item 2	COMPLETED			See Attachment 1																																		
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Item 7																																						
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FIGURE 1

Apr 09 09 11:40p

Thomas Kmiec

4404492827

p.1

FAX COVER SHEET

DATE April 09, 2009

TO: Andrew N. Marantides Cleveland Div Air Quality FAX: (216) 420-8047 Phone: (216) 420-8049	FROM: Thomas D. Kmiec, J.D., P.E. T.D.Kmiec & Associates FAX: (440) 449-2827 Phone: (440) 449-4720
SUBJECT: Erievue Metal Treating Company - Scope of Services and Time-Line	Pages: ____ 6 ____ , including this cover sheet

COMMENTS:

Andrew:

Per our discussion today, attached is a copy of my Scope-of-Services with a Time-Line. I mailed a Hard Copy to you today.

I'll put cost to the Items and send my Proposal to Frank Geraci (Erievue). As soon as he gives me the "go-ahead" we'll move ahead

Don't hesitate to call me [(216) 314-6001] if you have any questions or comments.

Tom K.

Apr 09 09 11:40p

Thomas Kmiec

4404492827

p.2

***T.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826***

Phone (440) 449-4720 FAX (440) 449-2827

April 09, 2009

Andrew N. Marantides
Cleveland Division of Air Quality (CDAQ)
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

RE: Notice of Violation dated February 24, 2009 (Received February 27, 2009)
Erieview Metal Treating Company: Facility ID: 13-18-00-7275

Dear Mr. Marantides:

I am submitting this letter on behalf of Erieview Metal Treating Company (Erieview) in response to this subject CDAQ Notice-of-Violation dated 02/24/09; Received 02/27/09.

This letter will define a Scope-of-Services for the Bullet Items on Page 2, including a proposed Time Line to complete each Task. For clarity, I have numbered the Bullet Items 1 through 7.

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It is my understanding that these fees have been paid-in-full.

Time Line to Complete: This Item has been completed.

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Enclosed is a sample page of a Coating Line Addition Log (see Attachment 1). This sample is typical for all three (3) Coating Lines.

Time Line to Complete: This Item is completed.

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Task 1 Review the general Permit Terms & Conditions to determine (1) emission limitations, (2) operational restrictions, (3) control device operating parameter limitations. **NOTE:** If the Permits are not readily available, a Freedom-of-Information request will be made to the CDAQ in order to obtain copies. This would add time to the completion of this Task.

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- P007 - Electroless Nickel Automatic Barrel Plating Line, and
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Apr 09 09 11:40p

Thomas Kmiec

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p.4

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Task 5 Prepare a Final Report, with supporting documentation, with the results of the calculations for the type and amount of emissions.

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Do not hesitate to contact me at the letterhead address or at (216) 314-6001 (preferred) or at (440) 449-4720 if you have any questions.

Thank you for your cooperation.

Very truly yours,



Thomas D. Kmiec, J.D., P.E.
Professional Engineer

cc: Frank Geraci/Erieview Metal Treating w/o Enclosures
Valencia White/Field Enforcement Manager/CDAQ w/o Enclosures

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3/5/09	7:15	Plus BCK ML	5 gal	qi
3/6/09	7:15	Black Plus	2 1/2 gal	qi
3/6/09	11:00	Plus	3 gal	qi
3/10/09	12:00	Plus SE	2 1/2 gal	qi
3/10/09	11:00	440 BCK red.	1 1/2 gal	qi
3/11/09	9:30	440 BCK red.	1 gal	qi
3/13/09	1:00	440 red.	1 gal	qi
3/14/09	2:00	Plus	3 gal	qi
3/16/09	8:00	Plus I	2 gal	qi
3/17/09	9:30	Plus LMC	3 gal	qi
3/17/09	10:55	Plus ML	2 gal	qi
3/17/09	2:00	Plus Small	3 gal	qi
3/18/09	9:00	440 BCK	2 1/2 gal	qi
3/18/09	10:00	Black 440 B440 Reducer	3 gal 2 gal	qi
3/18/09	10:45	Black Plus ML	5 gal	qi
3/19/09	8:00	Plus I	2 gal	qi
3/23/09	9:55	Black Plus L	3 gal	qi
3/23/09	1:00	Black Plus L Black Plus L	2 gal 2 gal	qi
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Form 2799 Rev. None

ATTACHMENT 1

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FIGURE 1

Apr 10 09 08:34a

Thomas Kmiec

4404492827

p.1

FAX COVER SHEET

DATE April 10, 2009

TO: Andrew N. Marantides ← Cleveland Div Air Quality FAX: (216) 420-8047 Phone: (216) 420-8049	FROM: Thomas D. Kmiec, J.D., P.E. T.D.Kmiec & Associates FAX: (440) 449-2827 Phone: (440) 449-4720
cc: Valencia White [(216) 420-8047] ← Frank Geraci [(216) 663-2322]	
SUBJECT: Erievue Metal Treating Company - Scope of Services and Time-Line - Amended	Pages: <u>5</u> , including this cover sheet

COMMENTS:

Andrew:

Yesterday I submitted the Time-Line in Graph form but forgot to enter it into the **Text**. This FAX is an Amendment to the **Text** to include the Time-Line

Don't hesitate to call me [(216) 314-6001] if you have any questions or comments.

Tom K.

Apr 10 09 08:34a

Thomas Kmiec

4404492827

p.2

***T.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826***

Phone (440) 449-4720 FAX (440) 449-2827

April 09, 2009

Andrew N. Marantides
Cleveland Division of Air Quality (CDAQ)
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

RE: Notice of Violation dated February 24, 2009 (Received February 27, 2009)
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Task 4 Compare the operational information and records in light of the Permit Terms & Conditions to determine if a reportable deviation has occurred.

Task 5 Prepare Quarterly deviation reports, as required, for submission to CDAQ.

Time Line to Complete: Week 1 to Week 3 (see Figure 1)

Item 4: Prepare Applications for the Renewal of the OEPA PTIO for EU's K001, K002, and K003.

Task 1 The information obtained in Item 3 above would be used in the preparation of the Applications for the Renewal of the OEPA/PTIO for EU's K001, K002 and K003.

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Task 3 Prepare the PTIO Application Forms with Emission Activity Category (EAC) Forms and support information for submission to the CDAQ.

Time Line to Complete: Week 2 to Week 7

Item 5: Prepare Emission Calculations for the following Emission Units:

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Apr 10 09 08:34a

Thomas Kmiec

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p.4

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Time Line to Complete: Week 6 to Week 9

Item 6: Initial Notification Form and Notification of Compliance Status Report: - WWWWWW:

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Time Line to Complete: Week 10

Item 7: Initial Notification Form and Notification of Compliance Status Report: - MMMM:

Task 1 Review the regulation Published at 40 CFR Subpart MMMM in light of the operations of EU's K001, K002 and K003 to determine to which EU, if any, does this regulation apply.

Task 2 Prepare the Notification Form and Notification of Compliance Status Report for submission to the CDAQ, as required, or, in the alternative, prepare a report, with supporting documentation, to explain why these Notifications are not required..

Time Line to Complete: Week 11

Do not hesitate to contact me at the letterhead address or at (216) 314-6001 (preferred) or at (440) 449-4720 if you have any questions.

Thank you for your cooperation.

Very truly yours,

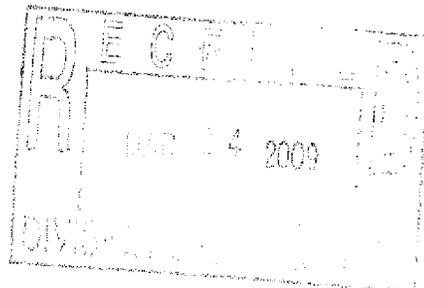
Thomas D. Kmiec, J.D., P.E.
Professional Engineer

cc: Frank Geraci/Erievew Metal Treating w/o Enclosures
Valencia White/Field Enforcement Manager/CDAQ w/o Enclosures

***F.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826***

Phone (440) 449-4720 FAX (440) 449-2827

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7155 5474 4100 4325 7127**



March 18, 2009

Andrew Marantides
Cleveland Division of Air Quality (CDAQ)
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

RE: Notice of Violation dated February 24, 2009 (Received February 27, 2009)
Erieview Metal Treating Company: Facility ID: 13-18-00-7275

Dear Mr. Marantides:

I am submitting this letter on behalf of Erieview Metal Treating Company (Erieview) in response to this subject CDAQ Notice-of-Violation dated 02/24/09; Received 02/27/09.

First of all; by this letter, I am **informing CDAQ that Erieview has requested that I submit a Proposal-for-Environmental Services** to them to perform the tasks to include, but not necessarily limited to, the **seven (7) Bullet Items** listed at the top of page 2 of 3 in this subject CDAQ Notice-of-Violation letter.

Secondly; I will prepare and submit the Proposal-for-Environmental Services to Erieview for approval. The Proposal will take about a week to complete because it will address **each** Bullet Item in greater detail so I can prepare a Scope-of-Services for each Task.

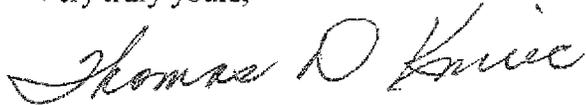
Thirdly; CDAQ has requested a written response from Erieview to correct the alleged violations ••• *“within thirty (30) days of Erieview’s receipt of this letter”*. (**Note: This letter was received on 02/27/09. The thirty (30) day clock ends on Sunday, 03/29/09 -- I presume the deadline for this response is Monday, 03/30/09.**)

It is my professional opinion that Erieview cannot correct the alleged violations on or before 03/30/09. Therefore, after I prepare the Scope-of-Services for each Task., I will prepare a ••• *“timeline for correcting the alleged violations”* with some degree of reality. It is my understanding from this subject letter, that this **“timeline”** must be submitted to CDAQ on or before Monday, 03/30/09.

Do not hesitate to contact me at the letterhead address or at (216) 314-6001 (preferred) or at (440) 449-4720 if you have any questions.

Thank you for your cooperation.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas D. Kmiec".

Thomas D. Kmiec, J.D., P.E.
Professional Engineer

cc: Frank Geraci/Erievue Metal Treating
Valencia White/Field Enforcement Manager/CDAQ
Mary McGear/CDAQ
Messrs. Richard Nemeth & Michael J. Krzywicki/CDAQ
John Paulian/OEPA/Central Office
Lisa Holscher/ USEPA/Region V

Mar 18 09 06:52p

Thomas D.Kmiec

440-449-2827

p.1

FAX COVER SHEET

DATE March 18, 2009

TO: Andrew Marantides Cleveland Div Air Quality FAX: (216) 420-8047 Phone: (216) 420-8049 SUBJECT: Erieview Metal Treating Company	FROM: Thomas D. Kmiec, J.D., P.E. T.D.Kmiec & Associates FAX: (440) 449-2827 Phone: (440) 449-4720 Pages: 3, including this cover sheet
---	--

COMMENTS:

Andrew:

Per our discussion today, attached is a copy of the Certified Letter I will mail to you this evening.

I will be in touch with Frank Geraci (Erieview) to move this thing ahead.

Don't hesitate to call me [(216) 314-6001] if you have any questions or comments.

Tom K.

***T.D. Kmiec and Associates
1520 Commodore Road
Lyndhurst, OH 44124-2826***

Phone (440) 449-4720 FAX (440) 449-2827

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7155 5474 4100 4314 2447**

March 18, 2009

Andrew Marantides
Cleveland Division of Air Quality (CDAQ)
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

RE: Notice of Violation dated February 24, 2009 (Received February 27, 2009)
Erieview Metal Treating Company: Facility ID: 13-18-00-7275

Dear Mr. Marantides:

I am submitting this letter on behalf of Erieview Metal Treating Company (Erieview) in response to this subject CDAQ Notice-of-Violation dated 02/24/09; Received 02/27/09.

First of all; by this letter, I am **informing CDAQ that Erieview has requested that I submit a Proposal-for-Environmental Services** to them to perform the tasks to include, but not necessarily limited to, **the seven (7) Bullet Items** listed at the top of page 2 of 3 in this subject CDAQ Notice-of-Violation letter.

Secondly; I will prepare and submit the Proposal-for-Environmental Services to Erieview for approval. The Proposal will take about a week to complete because it will address **each** Bullet Item in greater detail so I can prepare a Scope-of-Services for each Task.

Thirdly; CDAQ has requested a written response from Erieview to correct the alleged violations ••• ***“within thirty (30) days of Erieview’s receipt of this letter”.*** (Note: ***This letter was received on 02/27/09. The thirty (30) day clock ends on Sunday, 03/29/09 - - I presume the deadline for this response is Monday, 03/30/09.***

It is my professional opinion that Erieview cannot correct the alleged violations on or before 03/30/09. Therefore, after I prepare the Scope-of-Services for each Task., I will prepare a ••• ***“timeline for correcting the alleged violations”*** with some degree of reality. It is my understanding from this subject letter, that this ***“timeline”*** must be submitted to CDAQ on or before Monday, 03/30/09.

Mar 18 09 06:53p

Thomas D.Kmiec

440-449-2827

p.3

Do not hesitate to contact me at the letterhead address or at (216) 314-6001 (preferred) or at (440) 449-4720 if you have any questions.

Thank you for your cooperation.

Very truly yours,



Thomas D. Kmiec, J.D., P.E.
Professional Engineer

cc: Frank Geraci/Erievue Metal Treating
Valencia White/Field Enforcement Manager/CDAQ
Mary McGeary/CDAQ
Messrs. Richard Nemeth & Michael J. Krzywicki/CDAQ
John Paulian/OEPA/Central Office
Lisa Holscher/ USEPA/Region V

ERIEVIEW METAL TREATING 	4465 Johnston Parkway • Cleveland, Ohio 44128 Phone 216-663-2765 • Fax 216-626-1030	ISO 9001: 2000 CERTIFIED
--	--	------------------------------------

FAX TRANSMISSION COVER PAGE

IF TRANSMISSION IS NOT COMPLETE OR UNREADABLE PLEASE CALL

TO: __Andrew Marantides SUBJECT: __Invoices__ Phone: __216-664-2128__ Fax: 216-420-8047	FROM: __Frank Geraci__ DATE: __3/09/2009__ PAGES : __4__ including this cover sheet
--	--

[] URGENT [X] PLEASE REPLY [] PLEASE COMMENT

Andrew,
There is a problem with the Invoices. N001 1.5 MMBtu/hr Hydrogen
Embrittlement Oven did not come on line until Jan of 2009. Can you
Please adjust these Invoices?
Thanks
Frank Geraci
Please respond by fax as our phone lines are down and Phone company
Is not sure when we will be up and running.
Fax: 216-626-1030



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

FINAL NOTICE

January 1, 2009

2006 City of Cleveland Air Contaminant Source Invoice

Erieview Metal Treating Company (Apex Metal Finishing Company)

Facility ID:

13-18-00-7275

Facility Location:

4465 Johnston Parkway
Cleveland Ohio 44128

Source	Air Contaminant Source Name and Description	Fee
B001	5.2 MMBtu/hr gas-fired steam boiler	\$100.00
K001	Coating Line W/ 3 MMBtu/hr Oven For Misc. Metal Parts #2	\$37.50
K002	Coating Line W/ 1.5 MMBtu/hr Oven For Misc. Metal Parts #1	\$37.50
K003	Coating Line W/ 4.5 MMBtu/hr Oven For Misc. Metal Parts #3	\$37.50
L001	Cleaning Line	\$200.00
*N001	1.5 MMBtu/hr Hydrogen Embrittlement Oven *	\$50.00
N002	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N003	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N004	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
P001	Phosphate Automatic Barrel Plating Line	\$125.00
P005	Zinc Automatic Barrel Plating Line	\$125.00
P006	Zinc Nickel Automatic Barrel Plating Line	\$125.00
P007	Electroless Nickel Automatic Barrel Plating Line	\$125.00

* N001 Did Not Come On Line Until
JAN 2009



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

FINAL NOTICE

December 15, 200

2007 City of Cleveland Air Contaminant Source Invoice

Erieview Metal Treating Company (Apex Metal Finishing Company)

Facility ID:

13-18-00-7275

Facility Location:

4465 Johnston Parkway
Cleveland Ohio 44128

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B001	5.2 MMBtu/hr gas-fired steam boiler	\$100.00
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K002	Coating Line W/ 1.5 MMBtu/hr Oven For Misc. Metal Parts #1	\$37.50
K003	Coating Line W/ 4.5 MMBtu/hr Oven For Misc. Metal Parts #3	\$37.50
L001	Cleaning Line	\$200.00
* N001	1.5 MMBtu/hr Hydrogen Embrittlement Oven *	\$50.00
N002	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N003	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N004	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
P001	Phosphate Automatic Barrel Plating Line	\$125.00
P005	Zinc Automatic Barrel Plating Line	\$125.00
P006	Zinc Nickel Automatic Barrel Plating Line	\$125.00
P007	Electroless Nickel Automatic Barrel Plating Line	\$125.00



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

SECOND NOTICE

January 1, 2009

2008 City of Cleveland Air Contaminant Source Invoice

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13-18-00-7275

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L001	Cleaning Line	\$200.00
*N001	1.5 MMBtu/hr Hydrogen Embrittlement Oven *	\$50.00
N002	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N003	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N004	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
P001	Phosphate Automatic Barrel Plating Line	\$125.00
P005	Zinc Automatic Barrel Plating Line	\$125.00
P006	Zinc Nickel Automatic Barrel Plating Line	\$125.00
P007	Electroless Nickel Automatic Barrel Plating Line	\$125.00

R Sub A 63.9 (b) Initial Notific
National Emission Standards for Hazardous Air Pollutants:
Area Source Standards for Plating and Polishing Operations
40 CFR 63 subpart WWWWWW

Section 1. Facility Information

Yes, I am subject to 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Compliance Date: Existing source: July 1, 2010 New source: _____
(Date of startup)

No, I am NOT subject to 40 CFR Part 63 subpart WWWWWW. Reason not applicable:

If you checked the "No" box above, please complete this Section 1 and then proceed directly to Section 3 of this form (skip Section 2).

Company name

ERIEVIEW METAL TREATING Co.

Facility ID number (if available): _____

Facility name (if different): _____

Facility (physical location) address:

4465 JOHNSTON PARKWAY, CLEVELAND

OHIO, 44128

Owner name/title:

ALEX KAPPOS / PRES

Owner/company

Address: SAME

Owner telephone number

216-663-2765

Owner email address (if available):

ALEXK@ERIEVIEW.US

Is the Operator the same person as the Owner? Yes No

If the Operator information is different from the Owner, please provide the following:

^a This is an example of the type of information that must be submitted to fulfill the Initial Notification requirement of 40 CFR 53, subpart WWWWWW. You may submit the information in another form or format or you may use this form.

Operator name/title: _____

Operator telephone number: _____

Operator email address (if available): _____

Section 2. Identification of Affected Operations

Operating permit number (if available): _____

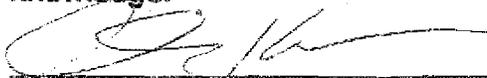
(1) The following are the operations at this facility subject to subpart WWWWWWW (check all that apply).^a

- Electroplating (noncyanide)
- Continuous electroplating (noncyanide)
- Short-term electroplating (noncyanide)
- Electropolishing
- Electroforming
- Electroplating (cyanide)
- Electroless nickel
- Chrome conversion coating
- Other electroless plating/coating/dipping
- Thermal spraying (permanent line)
- Thermal spraying (temporary, in-situ)
- Dry mechanical polishing

^a **Important Note:** These operations are affected sources under subpart WWWWWWW only if/when they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing HAP containing/potential is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.

Section 3. Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.



 (Signature)

10/29/08

 (Date)

Alex Kappas President

 (Name/title)

(216) 663-2765

 (Telephone No.)

Section 4. Submittal

Submit original to:
 Director, Air and Radiation Division
 US EPA Region V
 77 West Jackson Blvd.
 Chicago, IL 60604-3507

Send copy to:
 Robert Hodanbosi, Division Chief
 Ohio EPA, Div. of Air Pollution Control
 PO Box 1049
 Columbus, OH 43216

~~Send copy to:
 Ohio EPA District Office or
 Air Local (see next page
 for address)~~



City of Cleveland
 Frank G. Jackson, Mayor

Department of Public Health
 Division of Air Quality
 75 Erieview Plaza, 2nd Floor
 Cleveland, Ohio 44114-1839

FINAL NOTICE

January 1, 2009

2006 City of Cleveland Air Contaminant Source Invoice

Erieview Metal Treating Company (Apex Metal Finishing Company)

Facility ID:

13-18-00-7275

Facility Location:

4465 Johnston Parkway
 Cleveland Ohio 44128

Source	Air Contaminant Source Name and Description	Fee
B001	5.2 MMBtu/hr gas-fired steam boiler	\$100.00
K001	Coating Line W/ 3 MMBtu/hr Oven For Misc. Metal Parts #2	\$37.50
K002	Coating Line W/ 1.5 MMBtu/hr Oven For Misc. Metal Parts #1	\$37.50
K003	Coating Line W/ 4.5 MMBtu/hr Oven For Misc. Metal Parts #3	\$37.50
L001	Cleaning Line	\$200.00
N001	1.5 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N002	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N003	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
N004	1 MMBtu/hr Hydrogen Embrittlement Oven	\$50.00
P001	Phosphate Automatic Barrel Plating Line	\$125.00
P005	Zinc Automatic Barrel Plating Line	\$125.00
P006	Zinc Nickel Automatic Barrel Plating Line	\$125.00
P007	Electroless Nickel Automatic Barrel Plating Line	\$125.00

Total Fee for Facility:

\$1,112.50

Amount Paid:

13-18-00-7275

By signing this form, I affirm, based on information and belief formed after reasonable inquiry, that all factual statements in this report are true and complete to the best of my knowledge, and that all judgments and estimates provided in this report have been made in good faith. I further affirm that this listing comprises a complete listing of all air contaminant sources at this facility, or that I have enclosed permit application forms addressing all air contaminant sources not listed. I understand that the data provided in this document is used by the City of Cleveland to calculate a fee, which my facility is required to pay under Chapter 263 of the City of Cleveland Health Code.

Signature of Responsible Official: _____

Amount Remitted

Name (please print)

Title (please print)

Phone Number (please print)

Please return this Air Contaminant Source Invoice bearing an original signature as well as any additional permit applications along with the Total Fee for Facility shown above to:

City Permits Section
Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114 - 1839

Payment must be received by:
January 31, 2009

Funds must be made
payable to:
Treasurer, City of
Cleveland.

THANK YOU!



City of Cleveland
 Frank G. Jackson, Mayor

Department of Public Health
 Division of Air Quality
 75 Erieview Plaza, 2nd Floor
 Cleveland, Ohio 44114-1839

FINAL NOTICE

December 15, 200

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Cleveland, OH 44114 -
1839

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Treasurer, City of
Cleveland.

THANK YOU!



City of Cleveland
 Frank G. Jackson, Mayor

Department of Public Health
 Division of Air Quality
 75 Erievue Plaza, 2nd Floor
 Cleveland, Ohio 44114-1839

SECOND NOTICE

January 1, 2009

2008 City of Cleveland Air Contaminant Source Invoice

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75 Erievue Plaza, 2nd Floor
Cleveland, OH 44114 -
1839

Payment must be received by:
January 31, 2009

Funds must be made
payable to:
Treasurer, City of
Cleveland.

THANK YOU!

**40 C.F.R Sub A 63.9 (b) Initial Notification
National Emission Standards for Hazardous Air Pollutants:
Area Source Standards for Plating and Polishing Operations
40 CFR 63 subpart WWWWWW**

Section 1. Facility Information

Yes, I am subject to 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Compliance Date: Existing source: July 1, 2010 New source: _____
(Date of startup)

No, I am NOT subject to 40 CFR Part 63 subpart WWWWWW. Reason not applicable:

If you checked the "No" box above, please complete this Section 1 and then proceed directly to Section 3 of this form (skip Section 2).

Company name _____

Facility ID number (if available): _____

Facility name (if different): _____

Facility (physical location) address: _____

Owner name/title: _____

Owner/company Address: _____

Owner telephone number _____

Owner email address (if available): _____

Is the Operator the same person as the Owner? Yes No

If the Operator information is different from the Owner, please provide the following:

⁵ This is an example of the type of information that must be submitted to fulfill the Initial Notification requirement of 40 CFR 53, subpart WWWWWW. You may submit the information in another form or format or you may use this form.

Operator name/title: _____

Operator telephone number: _____

Operator email address (if available): _____

Section 2. Identification of Affected Operations

Operating permit number (if available): _____

(1) The following are the operations at this facility subject to subpart WWWWWWW (check all that apply):^a

- Electroplating (noncyanide)
- Continuous electroplating (noncyanide)
- Short-term electroplating (noncyanide)
- Electropolishing
- Electroforming
- Electroplating (cyanide)
- Electroless nickel
- Chrome conversion coating
- Other electroless plating/coating/dipping
- Thermal spraying (permanent line)
- Thermal spraying (temporary, in-situ)
- Dry mechanical polishing

^a **Important Note:** These operations are affected sources under subpart WWWWWWW **only if/when** they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing HAP containing/potential is defined to be when the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.

Section 3. Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.

(Signature)

(Date)

(Name/title)

(_____)_____
(Telephone No.)

Section 4. Submittal

Submit original to:
Director, Air and Radiation Division
US EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604-3507

Send copy to:
Robert Hodanbosi, Division Chief
Ohio EPA, Div. of Air Pollution Control
PO Box 1049
Columbus, OH 43216

Send copy to:
Ohio EPA District Office or
Air Local (see next page
for address)