



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Frievew Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/684-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL #70093410000219339537
RETURN RECEIPT REQUESTED**

September 28, 2010

David Cook
Cook Bonding and Manufacturing
701 West Schaaf Road
Cleveland, OH 44109

NON-HPV

FACILITY ID: 13-18-00-7305

NOTICE OF VIOLATION: Operating emission units without permits

Dear Mr. Cook:

On September 13, 2010, the Cleveland Division of Air Quality (CDAQ) inspected Cook Bonding and Manufacturing (Cook Bonding) located at 701 West Schaaf 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.

Cook Bonding is in violation of Ohio Revised Code 3704.05(F) and (G), and Ohio Administrative Code 3745-31-02(A)(1) for operating a Natural Gas 90,000 BTU/hour Ace Micro-Ramp Heat Cleaning Oven equipped with a 425,000 BTU/hour afterburner (Heat Cleaning Oven), without permits.

Cook Bonding has also failed to obtain City of Cleveland permits-to-operate for the Emission Unit(EU) P001: wheelabrator, tumble blast cleaning machine manufactured by Pangborn, installed in 1987 for the calendar years 2007, 2008 and 2009. In addition, Cook Bonding has failed to obtain city permits for the Heat Cleaning Oven and a second Wheelabrator, tumble blast cleaning machine manufactured by Wheelabrator installed in 2005 for the calendar years 2006, 2007, 2008 and 2009. This is a violation of City of Cleveland Codified Ordinances 259.01 and 263.01.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Cook Bonding submit a Permit-to-Install/Operate (PTIO) application for the Heat Cleaning Oven or calculations proving the Heat Cleaning Oven to be "De Minimis" status to the



following address within 30 days of receipt of this letter:

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

Also, CDAQ requests that Cook Bonding obtain city permits for the EU P001: wheelabrator, tumble blast cleaning machine manufactured by Pangborn, installed in 1987, for calendar years 2007, 2008 and 2009 as well as city permit fees for the Heat Cleaning Oven and the second Wheelabrator, tumble blast cleaning machine manufactured by Wheelabrator installed in 2005, for calendar years 2006, 2007, 2008 and 2009 to the following address within 30 days of receipt of this letter:

City Permit Fee Invoices
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.

City of Cleveland permit fee invoices are included in this letter, PTIO applications can be found at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. 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.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. Should you have any questions, please call Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cook Bonding: 13-18-00-7305.

Sincerely,

Linda Jimmy for G.B.

George Baker
Chief of Enforcement

GB/ak

cc: Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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encl: City of Cleveland permit fee invoices