



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Second Floor  
Cleveland, Ohio 44114-1839  
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**SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7011 2000 0002 6936 2993  
RETURN RECEIPT REQUESTED**

July 17, 2012

Sam Sharaba  
Owner  
Cartruck Packaging  
7315 Associate Avenue  
Brooklyn, OH 44144

**NON-HPV**

**FACILITY ID: 13-18-10-8387**

**NOTICE OF VIOLATION: Failure to comply with the National Emission Standards for Halogenated Solvent Cleaning (40 CFR Part 63 Subpart T) and Ohio Administrative Code (OAC) rule 3745-21-09 (O)(3); failure to comply with permit-to-install (PTI) No. 13-04213; and failure to submit a permit-to-install/operate (PTIO) application for Spray Booth Line #5**

Dear Mr. Sharaba:

On June 25, 2012, the Cleveland Division of Air Quality (CDAQ) inspected Cartruck Packaging located at 7315 Associate Avenue in Brooklyn. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Cartruck Packaging's operation of emissions unit (EU) L001: Open Top Vapor Degreaser using trichloroethylene, is in violation of Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(b), in that Cartruck Packaging failed to first obtain authority to operate EU L001 through issuance of a permit-to-install/operate (PTIO). Based on information obtained prior to and during CDAQ's inspection, EU L001 was installed in January 1986. CDAQ did not receive a PTIO application for EU L001's operation until March 2, 2012.

Additionally, your operation of EU L001 is in violation OAC rule 3745-21-09 (O)(3), Ohio Revised Code (ORC) sections 3704.05 (F) and (G), and Title 40 Code of Federal Regulations (CFR) Part 63, Subpart T. Cartruck Packaging has failed to meet the requirements of Subpart T by the compliance date as established by the rule, which was December 2, 1997. This is a violation of Subpart T § 63.463(d). Additional violations of Subpart T are included below and follow that Cartruck Packaging's operation of its batch vapor degreaser fails to conform to the design requirements found in § 63.463.



The following are additional violations of Subpart T:

A violation of § 63.463(a)(1):

- Cartruck Packaging does not meet either (i) acceptable cover requirements in that it does not completely cover the cleaning machine openings when in place, and is free of cracks, holds, and other defects; or, (ii) has a reduced room draft as described in § 63.463(e)(2)(ii).

A violation of § 63.463(a)(4):

- The vapor degreaser is not equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

A violation of § 63.463(a)(5) and (6):

- The vapor degreaser is not equipped with a vapor level control device that shuts off sump heat if the vapor level in the machine rises above the height of the primary condenser. It was confirmed during CDAQ's inspection that the vapor degreaser in operation at Cartruck Packaging does not have a primary condenser.

And, a violation of § 63.463(b)(1):

- An owner or operator of a batch vapor cleaning machine with a solvent/air interface area greater than 13 square feet shall comply with either paragraph in §63.463(b)(2)(i) or (ii).

Furthermore, the initial notification required under Subpart T has not been received by CDAQ. Under Subpart T § 63.468(a), the owner or operator of an existing solvent cleaning machine subject to Subpart T, shall submit an initial notification report no later than August 29, 1995.

Moreover, during CDAQ's inspection on June 25, 2012, it was determined that EU K001 was initially permitted as one air emission source; however, it contains two coating lines, each with its own exhaust stack. Cartruck Packaging identifies these two coating lines as Lines #1 and #2. As such, Cartruck Packaging has failed to comply with PTI No. 13-04213 in regards to EUs K001 – K004, which cover Paint Booth Lines #1 (EU K001), #2 (EU K001), #3 (EU K002), #4 (EU K003), and #6 (EU K004); in that the facility failed to keep the following records: daily paint and cleanup material usage, and daily, monthly and yearly calculated VOC emissions from paint and cleanup material usage. Cartruck Packaging has also failed to submit quarterly deviation reports as required by PTI No. 13-04213, issued on October 12, 2004. CDAQ has not received any quarterly deviation reports since PTI No. 13-04213 was issued. These are violations of PTI No. 13-04213, and ORC sections 3704.05(C) and (G).



CDAQ has also determined that Cartruck Packaging installed an additional paint booth, Coating Line #5, in July 2008, in violation of OAC rule 3745-31-02(A)(1)(b); in that you failed to first obtain authority to operate this air emission source through issuance of a PTIO. CDAQ did not receive an application for this air emissions source until March 2, 2012. This is also a violation of ORC sections 3704.05(F) and (G).

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

- In regards to EU L001, the initial notification required pursuant to 40 CFR Part 63 Subpart T § 63.468(a), a PTIO application, and a corrective action plan which will demonstrate compliance with OAC rule 3745-21-09 (O)(3) and 40 CFR Part 63, Subpart T.
- In regards to Line #5 (EU K005), a PTIO application pursuant to OAC rule 3745-31-02(A)(1)(b).
- In regards to Paint Booth Lines #1, 2, 3, 4 and 6 (EUs K001-K004), updated PTIO applications which correctly reflect current operations at your facility, pursuant to OAC rule 3745-31-02(A)(1).

The above documents shall be submitted to the following enforcement representative:

Valerie Shaffer  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> 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.

Permit-to-install/operate (PTIO) applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned. 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 Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for Cartruck Packaging: 13-18-10-8387.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/vls LK

cc: George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
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