



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza
Cleveland, Ohio 44114-2080
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 3775
RETURN RECEIPT REQUESTED

January 16, 2009

Gerald J. Schill
Chemical Solvents, Inc.
3751 Jennings Road
Cleveland, OH 44109

FACILITY ID: 13-18-00-7651

NOTICE OF VIOLATION : Inadequate annual reporting as required by J002's PTO; Semi-annual deviation reports not received for L001 and L002; PTIO applications not received for T074 and T076; and required deviation reports not received for T074 and T076

Dear Mr. Schill:

On November 20, and December 5, 2008, the Cleveland Division of Air Quality (CDAQ) inspected Chemical Solvents, Inc. (CSI) located at 3751 Jennings Road 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.

CSI's operation of emissions unit J002: Solvent loading and unloading racks at Jennings, is in violation of Ohio Revised Code (ORC) sections 3704.05 (C) and (D), in that submitted annual reports for J002 did not contain all required information per the issued permit to operate (PTO). The following information was omitted: summary report on the operation, replacement, and repair of the elapsed time meter; and the operating hours of the compressor and/or the vapor recovery system. CSI has been in violation for reporting years 2005, 2006, and 2007.

CSI's operation of emissions units L001 and L002: Rim paint stripping operation, is also in violation, in that semi-annual deviation reports for the past four (4) years, as required by PTI #13-03755, have not been received by CDAQ. After a thorough review of submitted reports, CDAQ has determined that the latest semi-annual deviation report, dated July 30, 2004, was received for the first half of 2004. This is a violation of PTI #13-03755, and ORC sections 3704.05 (C) and (D),

It should be noted that CDAQ issued a Notice of Violation (NOV) to CSI on July 16, 2004, citing CSI with failure to submit semi-annual deviation reports, as required per PTI#13-03755 part I section (A)(1)(c)(iii).



Again, on May 9, 2005, CDAQ issued another NOV to CSI, citing the same violation and added that semi-annual annual deviation reports are required every six months, i.e. January 31 and July 31 of each year for the previous six calendar months. CDAQ also noted in the NOV that CSI has not submitted a semi-annual report since July 30, 2004.

Additionally, CSI's operation of emissions units T074 and T076; 30,000 gallon solvent tanks 35 and 33, respectively, are in violation of their issued PTI. Quarterly and semi-annual deviation reports for both units have not been received by CDAQ since permit issuance on May 11, 2004. The above are violations of PTIs #13-4195 and #13-3958, respectively, and ORC sections 3704.05 (C) and (D).

In addition, operating permits for T074 and T076 have not been applied for within one year following PTI issuance of both units which occurred on May 11, 2004. This is a violation of ORC 3704.05 sections (F), and (G); and Ohio Administrative Code 3745-31-02(A)(1)(b).

Furthermore, CDAQ is requesting detailed organic compound and VOC emissions from drum and tote filling operations. During the December 5, 2008 compliance inspection, it was determined that emissions from such operations were uncontrolled. CDAQ also received a printout of solvent product, as repackaged, on December 5, 2008; however, daily and annual emissions (as emitted) were not supplied.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that CSI submit a corrective action plan within 14 days of receipt of this letter, and submit daily and annual emissions from drum and tote filling operations by February 16, 2009, to the following enforcement representative:

Valerie Shaffer
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd flr
Cleveland, Ohio 44114

If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Appropriate permit application(s) and supplemental form(s) can be obtained from the Ohio EPA's website. Please note that all permit applications submitted to CDAQ must include an original signature by an official representative of CSI. 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.

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 CSI: 13-18-00-7651.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker
Chief of Enforcement, CDAQ

GB/vls

cc: Tony Dattilo, EnviroMatrix, Inc
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007651\2008-12-05 NOV.doc

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- 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:

MR. GERALD J. SCHILL
 CHEMICAL SOLVENTS, INC
 3751 JENNINGS ROAD
 CLEVELAND, OHIO 44109

COMPLETE THIS SECTION ON DELIVERY

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 K. Erney Addressee

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