



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 7003 1010 0004 2923 2952
RETURN RECEIPT REQUESTED

January 13, 2010

Mitch Kanuch
Enamelac Company
18103 Roseland Road
Cleveland, Ohio 44112

HIGH PRIORITY FACILITY

FACILITY ID: 1318007870

NOTICE OF VIOLATION: MONITORING, RECORDKEEPING, AND REPORTING
REQUIREMENTS

Dear Mr. Kanuch:

On November 24, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Enamelac Company located at 18103 Roseland 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.

Enamelac Company is in violation of Ohio Administrative Code (OAC) Rule 3745-15-03(C), Ohio Revised Code (ORC) sections 3704.05(C) and (G) and Permit to Operate (PTO) General Terms and Conditions Part I.3.b. for failing to submit quarterly deviation reports electronically via Ohio EPA's Air Services beginning with the fourth quarter of 2008.

Enamelac Company is in violation of emission unit K013: Global Finishing Solutions Spray Paint Booth #2 PTO Special Terms and Conditions Part II.D. for failing to electronically submit the 2008 annual Volatile Organic Compound (VOC) report by the February 1, 2009, due date.

Enamelac Company is in violation of emission unit K013: Global Finishing Solutions Spray Paint Booth #2 PTO Special Terms and Conditions Part II.C. for failing to maintain the following monthly records since October 4, 2006:

- a) The VOC content of each coating and cleanup material employed, as applied, in percent by weight.



- b) The total volatile organic material usage from all coating and cleanup materials employed calculated by summing the records of [(2.b) * (2.c)] for each coating and cleanup material
- c) The total VOC emissions generated from all coating and cleanup materials employed calculated by summing the records of [(2.b) * (2.c)] for each coating and cleanup material, and subtracting any recovered material in (lbs/month).

Enamelac Company is in violation of emission unit L002: Vapor Degreaser #2 PTO Special Terms and Conditions Part II.D. for failing to electronically submit the 2008 annual VOC report, annual solvent emissions report, and the annual exceedance report by the February 1, 2009, due date.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Enamelac Company submit all required reports electronically through the E-business center within 30 days of receipt of this letter.

Also, CDAQ requests Enamelac Company begin to correctly maintain monthly recordkeeping on emission unit K013 and then submit a sample copy of the corrected monthly recordkeeping within 30 days of receipt of this letter to the following enforcement representative:

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

If there is insufficient time to correct the alleged violations within this timeframe, a written response that includes a timeline for correcting the alleged violations must be submitted within 30 days of receipt of this letter.

In addition, Enamelac Company has agreed to maintain recordkeeping requirements for the Grieve TSH 500 Electric Oven under the OAC Rule 3745-15-05(E) as a de-minimis source.

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 Mike Samco at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA facility identification number for Enamelac Company: 1318007870.

Sincerely,

Linda Rummy for G.B.

George Baker
Chief of Enforcement

GB/ms

cc: 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\1318007870\2009-11-24 NOV.doc

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 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. 	A. Signature <i>M. Kanich</i> <div style="float: right;"> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee </div>	
1. Article Addressed to: # 970 Mitch Kanich Enamelac Company 18103 Roseland, Rd Cleveland, Oh 44112	B. Receiver by (Printed Name) <i>M. Kanich</i>	C. Date of Delivery <i>11/9/10</i>
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input checked="" type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
7003 1010 0004 2923 2952		

Enamelac Company
18103 Roseland Road
Cleveland, Ohio 44112
216-481-8878 phone
216-481-8245 fax

FEB - 1 2010

January 29, 2010

Attn: Mr. Mike Samec
Cleveland Division of Air Quality
75 Erievue Plaza - 2nd Floor
Cleveland, OH 44114

Facility ID No. 13-18-00-7870

RE: Notice of Violations (NOV) Response

Dear Mr. Samec,

Please accept this letter as a response to the January 13, 2010 NOV Letter and request for corrective actions in response to certain violations noted during the recent on-site inspection of November 24, 2009;

In response to the failure to submit quarterly deviation reports electronically via Ohio EPAs Air Services beginning with the fourth quarter of 2008, and the resulting multiple, similar 'failure to electronically submit' infractions that occurred thereafter with respect to (1) EU K013 '2008 Annual VOC Report' by 02/01/2009 due date and (2) EU L002 '2008 Annual VOC Report', 'Annual Solvent Emissions Report' and 'Annual Exceedance Report' by 02/01/2009 due date; Enamelac personnel were unaware of the requirement to submit these reports electrically until informed by yourself in the course of the facility inspection. Further, you stated that notification of this requirement was made to Enamelac by Ohio EPA; however, Enamelac is unaware of this notification and requests a copy of same for our records.

Electronic submittal of the reports described above has now been made through Air Services, however, we do not agree that this was a violation of either emission units PTO as we are not aware of any revisions that have been made to those documents and issued to our facility. We will continue to abide by your request and stated requirement to provide electronic submittal of EU Reports through Air Services, but believe that citing these as violations is punitive in nature, rather than constructive.

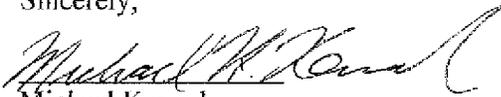
With respect to the noted violations at the bottom of the cover page, where you state that "Enamelac Company is in violation of emission unit K013: Global Finishing Solutions Spray Paint Booth #2 PTO Special Terms and Conditions Part II.C. for failing to maintain the following monthly records since October 4, 2006:" noting subparts a), b) and c) - please be advised that these records have been kept, but were never requested during, or

following the on-site inspection. Mr. Joe O'Brien, a consultant to Enamelac Company has informed us that he has since transmitted the past year's worth of these forms, electronically, to your e-mail account as they would require many pages of copying to offer in hard copy. We trust that this submittal will satisfactorily serve as a response to these violations.

Enamelac Company has instituted the use of a Usage Log for the Grieve TSH 500 Electric Oven that bakes the powder coated parts at the facility, maintaining *de minimus* status. This log will document that baked parts are 'powder-coat' processed, only.

We trust that this response will meet the needs of your 01-13-2010, NOV letter. Please direct any comments or questions to this office.

Sincerely,



Michael Kanuch
President

MK/dd

Cc: Mr. Joe O'Brien, President, O'Brien Technical Services, Inc.