



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 2563  
RETURN RECEIPT REQUESTED**

March 8, 2011

Michael Ciofani  
Comm Steel  
900 East 69<sup>th</sup> Street  
Cleveland, OH 44103

**FACILITY ID: 13-18-00-7892  
RECEIPT OF CORRECTIVE ACTION PLAN: FAILURE TO SUBMIT A NEW  
APPLICATION FOR P001: SHOT DESCALER AND FAILURE TO OBTAIN CITY  
PERMITS-TO-OPERATE BY SUBMITTING CITY PERMIT FEES FOR  
CALENDAR YEARS 2006, 2007 AND 2008**

Dear Mr. Ciofani:

On December 2, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Comm Steel submit a new Permit to Install/Operate (PTIO) application for P001: Shot Descaler and obtain city permits-to-operate by submitting city permit fees for calendar years 2006, 2007 and 2008. A Second Notice of Violation was sent on January 10, 2011 for the same violations after no response was received within fourteen (14) days of your receipt of the initial Notice of Violation.

CDAQ is in receipt of city permit fees for calendar years 2006, 2007 and 2008 dated February 22, 2010. Also, CDAQ was notified that Adrienne LaFavre of the Office of Compliance Assistance and Pollution Prevention (OCAPP) will be visiting Comm Steel on March 22, 2011 to offer compliance assistance with submitting a new PTIO application for P001: Shot Descaler.

You are expected to comply with submitting a new PTIO application for P001: Shot Descaler by April 22, 2010. CDAQ also requests that Comm Steel submit a written transfer of ownership request form stating that ownership has changed from Ferro-Prep Corporation to Comm Steel. 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. Please submit any future correspondence related to this matter to the following enforcement representative:



Andrew Marantides  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

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 Comm Steel: 13-18-00-7892.

Sincerely,

A handwritten signature in cursive script that reads "Linda Kimmy".

Linda Kimmy  
Field Enforcement Manager, CDAQ

LK/AM

cc: Yismaw Desta, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318007892\2010-12-2 RCAP.docx

encl: Transfer of Ownership Request Form

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, a. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <span style="float: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</span>  <i>Patty Strough</i></p> <p>B. Received by (Printed Name) <span style="float: right;">C. Date of Delivery</span>  <i>Patty Strough</i> <span style="float: right;"><i>3-14-11</i></span></p>
<p>1. Article Addressed to:</p> <p><i>Michael Ciofani</i>  <i>Comm Steel</i>  <i>900 East 69<sup>th</sup> Street</i>  <i>Cleveland, OH 44103</i></p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  if YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number  (Transfer from service label)</p>	<p><i>7003 1010 0004 2923 2563</i></p>



March 24, 2011

Cleveland Division of Air Quality  
75 Erie View Plaza  
Suite 200  
Cleveland, OH 44114  
Attention: Andrew Marantides

Dear Mr. Marantides;

I have filled out the form for Transfer of Ownership per your request in the "Notice of Violation letter we have received.

If you should have any questions, please feel free to contact Michael Ciofani at 216-881-4600 ext. 201. Thank you for your assistance in this matter.

Sincerely;



Michael Ciofani  
Vice President  
Comm Steel, Inc.

C E I Y  
MAR 28 2011



# Ohio Environmental Protection Agency

## Request for Transfer of Ownership

Form Revised: 08/2009

### INSTRUCTIONS<sup>1</sup>

This form<sup>2</sup> is for non-Title V facilities only and only needs to be completed for the information you want to update for your facility as part of notifying the DAPC of a transfer in ownership. Complete this form to update Ohio EPA's records to transfer facility ownership or change the Authorized Representative (AR)/contact information for a permitted facility regulated by the Ohio EPA Division of Air Pollution. Complete the form to establish or update the various contact types identified below. Submit the completed form to your Ohio EPA District Office or local air agency<sup>3</sup> contact.

#### Ownership transfer information Check here if no change in ownership)

Effective Date of Transfer:	3/24/2011
Air Facility ID:	1318007892

Old	Facility Name:	Ferro-Prep Corp.
	Facility Address**:	900 E. 69th Street
	Facility City, State, Zip:	Cleveland, OH 44103

New	Facility Name:	Comm Steel, Inc.
	Facility Address**:	900 E. 69th Street
	Facility City, State, Zip:	Cleveland, OH 44103
	Mailing Address:	Same as Above
	Mailing City, State, Zip:	

\*\* If facility address has changed, please provide a detailed explanation:

New Owner (complete all that apply)	Circle one:	Corporation      Person
	Name:	Michael Ciofani - Comm Steel, Inc.
	Title:	Vice President
	Phone:	216-881-4600 ext. 201
	Fax:	216-881-7643
	Email:	mciofani@commsteel.com
	Address:	900 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103



# Ohio Environmental Protection Agency

## Request for Transfer of Ownership

Form Revised: 08/2009

### Contact information

Authorized Representative	Name:	Michael Ciofani
	Title:	
	Phone:	216-881-4600 ext. 201
	Fax:	216-881-7643
	Email:	mciofani@commsteel.com
	Address:	900 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103

On-Site	Name:	Michael Ciofani
	Title:	
	Phone:	216-881-4600 ext. 201
	Fax:	216-881-7643
	Email:	mciofani@commsteel.com
	Address:	900 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103

Operator	Name:	Chuck Staresina
	Title:	
	Phone:	216-798-4652
	Fax:	N/A
	Email:	N/A
	Address:	950 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103



# Ohio Environmental Protection Agency

## Request for Transfer of Ownership

Form Revised: 08/2009

Billing	Name:	Robert Ciofani
	Title:	Secretary/Payables
	Phone:	216-881-4600 ext. 216
	Fax:	216-881-7643
	Email:	rciofani@commsteel.com
	Address:	900 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103

Primary	Name:	Eddie B. Perkins
	Title:	President
	Phone:	216-881-4600 ext. 213
	Fax:	216-881-7643
	Email:	eperkins@commsteel.com
	Address:	900 E. 69th Street
	City, State, Zip:	Cleveland, OH 44103

Other	Other Type:	
	Name:	
	Title:	
	Phone:	
	Fax:	
	Email:	
	Address:	
	City, State, Zip:	

  
Michael Ciofani

Completed by

Date



# Ohio Environmental Protection Agency

## Request for Transfer of Ownership

Form Revised: 08/2009

Ohio EPA use only

Recommended By: **Andrew Marantides**

Date Form Completed:

3/28/2011

<sup>1</sup> This form is not required. A simple letter can suffice. This form can also be used to update contact information absent a transfer of ownership. Simply check the "No change in Ownership" box at the top of the form. Complete whichever contact types are changing.

<sup>2</sup> You do not need to submit this form or any other hard copy notification if you are an Air Services User through the Ohio EPA eBusiness Center. For more information about Air Services User and the Ohio EPA eBusiness Center, we suggest review of the Ohio EPA Answer Place topic describing the eBusiness Center at:

<http://ohioepa.custhelp.com> and search for "1129" or "What is Ohio EPA's eBusiness Center?"

<sup>3</sup> See <http://www.epa.state.oh.us/dapc/general/dolaa.html> or call 614.644.2270 to find out where to send this form.