



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
1925 St. Clair Avenue  
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 3904  
RETURN RECEIPT REQUESTED

May 27, 2008

Mark Lieberman  
Avon Drive-In Laundry and Dry Cleaning  
1830 Superior Avenue  
Cleveland, OH 44114

FACILITY ID: 13-18-00-7917

LETTER OF WARNING: Monitoring, Recordkeeping and Reporting deficiencies

Dear Mr. Lieberman:

On May 19, 2008, the Cleveland Division of Air Quality (CDAQ) inspected Avon Drive-In Laundry and Dry Cleaning (Avon) located at 1830 Superior Avenue 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.

Avon's operation of two, P460 Sailstar, dry-cleaning machines is in violation of permit-to-install (PTI) #13-04519, as issued on July 7, 2007; in that Avon failed:

- 1) to meet deviation reporting requirements (Part III. A. IV.1.),
- 2) to conduct a leak detection and repair program to inspect all dry cleaning equipment (Part III. A. III. 1.),
- 3) to measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerator condenser (Part III. A. III. 2.), and
- 4) to record the monthly volume of perchloroethylene purchased, and calculate the yearly perchloroethylene consumption (i.e. 12-month rolling summation) (Part III. A. III. 3. b. and c.).

The above violations, also violate Ohio Revised Code sections 3704.05(C) and (G).

Additionally, Avon's operation violates the following requirements of the Ohio Administrative Code (OAC) paragraph 3745-21-09 (AA):

OAC Rule 3745-21-09(AA)(1) The operator of a PERC dry cleaning facility shall meet all requirements under this rule.



OAC Rule 3745-21-09(AA)(3) The operator of a PERC dry cleaning facility shall visually inspect the following components to determine compliance with OAC Rule 3745-21-09(AA)(1)(e): hose connections, unions, couplings, and valves; machine door gaskets and seatings; filter head gasket and seating; pumps; base tanks and storage containers; water separators; filter sludge recovery; distillation unit; diverter valves; saturated lint from lint basket; and cartridge filters.

OAC Rule 3745-21-09(AA)(4)(b) The operator of a PERC dry cleaning facility shall keep a record of the visual leak inspection results.

Furthermore, Avon is also in violation of Title 40 of the Code of Federal Regulations, Part 63, Subpart M – National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities, in that:

Avon failed to inspect the PERC dry cleaning system weekly for perceptible leaks. This is a violation of § 63.322(k).

Avon failed to monitor the refrigeration system high pressure and low pressure parameters, during the drying phase, to determine if they are in the specified range per the manufacturer's operating instructions. This is a violation of § 63.323(a)(1)(i).

Avon failed to record the monthly volume of perchloroethylene purchased and calculate the yearly perchloroethylene consumption. This is a violation of § 63.324(d)(1) and (2).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Avon provide a course of action to correct the stated violations to the following enforcement representative:

Valerie Shaffer  
Cleveland Division of Air Quality  
1925 St. Clair Avenue NE  
Cleveland, Ohio 44114-2080

Your written response to this letter must be received by CDAQ within fourteen (14) 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.



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.state.oh.us/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.

Sincerely,

George Baker  
Chief of Enforcement, CDAQ

GB/vls

cc: John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318007917\2008-05-19 NOV.doc

**SENDER: COMPLETE THIS SECTION**

- 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.

1. Article Addressed to:

Mark Lieberman  
Artem Laundry & Dry Cleaning  
1830 Superior Ave  
Cleveland, OH 44114

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

x *Brenda Jay*  Agent  Addressee

B. Received by (Printed Name)

Date of Delivery

6/5/01

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail
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4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number  
(Transfer from service label)

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