



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 2808
RETURN RECEIPT REQUESTED

5/6/10

Doug McKinzie, Co-President
Novagard Solutions, Inc.
5109 Hamilton Ave.
Cleveland, OH 44114-3907

FACILITY ID: 13-18-00-7976

RECEIPT OF CORRECTIVE ACTION PLAN: failure to submit a permit-to-install/operate (PTIO) application and failure to obtain city permits to operate

Dear Mr. McKinzie:

On 3/19/10, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Novagard Solutions, Inc. (Novagard) to submit an Ohio EPA permit-to-install/operate and submit calendar years' 2006, 2007, 2008 and 2009 City of Cleveland Air Contaminant Source fees.

CDAQ is in receipt of calculations which explain how P002: a silicone adhesive manufacturing process and P003: silicone grease manufacturing process meet Ohio EPA de minimis criteria. The letter was dated 4/16/10. Criteria for City of Cleveland permits to operate are more inclusive than those of the State of Ohio. CDAQ determined that Novagard is not exempt from obtaining City of Cleveland permits-to-operate. This determination is based on the Codified Ordinances of the City of Cleveland, sections 259.01 and 263.01. Cleveland permit fee invoices are enclosed.

You are still expected to obtain 2006, 2007 and 2008 city permits to operate for emission units (EUs) B001, B002 and P001 and 2006, 2007, 2008 and 2009 city permits to operate for EUs P002 and P003. Please submit 2006 through 2009 city permits to operate by submitting city permit fees to the following address by 5/28/10:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plz., 2nd Floor
Cleveland, OH 44114-1839



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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA facility identification number for Novagard: 13-18-00-7976.

Sincerely,

Linda Kimmy for G.B.

George P. Baker
Chief of Enforcement, CDAQ

GPB/dlw

cc: Michael Krzywicki
Facility File and L:\Data\Facilities\1318007976\2010-02-19 RCAP.docx

encl.: 2006 through 2009 city permit fee invoices



April 16, 2010

Mr. David Wagner
Environment Enforcement Specialist
Ohio EPA – Agency 13 (Cuyahoga)
Department of Public Health
75 Erieview Plaza, Suite 200
Cleveland, OH 44114-1839

Dear David,

In reference to the particulate emissions of our silicone sealant/adhesive process and our silicone grease process I would like to submit the attached calculations demonstrating our belief that as with VOC we are below the de minimus requirements for regulation.

Silicone/adhesive process

As discussed in our last visit the silicone sealant process/adhesive process utilizes a dust collection system. This system is required for operation for two reasons. The first is that since the silicone product cures in the presence of moisture we air condition the mixing room to control humidity. The air conditioning system will not operate if there is any dust loading in the air. The second reason is for our operator comfort and safety. Since the tanks used are chest high, the discharge of bagged powder materials is near the vicinity of the operator's faces. For both operator comfort and safety we utilize this dust collection system.

Three mixing stations are connected to one bag house dust collection system. The bag house is installed on the first floor in the room behind the mixing room. The bag house discharges into a cardboard shipping container in the basement. The contents of this box are disposed of as solid waste. The filtered, air conditioned air is returned to the mixing room.

We accumulate one cardboard box of material every two months. The weight of this material collected has been measured for the two month period and found to be 97 pounds. Based on the number of batches during this period of 252 batches, this is an actual dust rate of 0.38 lbs/batch.

On a potential to emit basis with a 2 hour cycle time per batch, 12 batches per day would be theoretically possible. Twelve batches times 0.38 lbs/batch equals 4.6 lbs per day of dust collected per mixing station on a potential to emit basis. This dust is collected and not emitted so the actual emissions are less. In any case even if the dust were not being collected emissions would be far less the 10 pounds per day.

Silicone grease process

The silicone grease process is not moisture sensitive and since the operator discharges material into a chute below waste level, we do not utilize a dust collect system for this process. To calculate the particulate emission of the grease we will use the information gathered from the silicone sealant/adhesive process of 0.38 lbs/batch, based on a loading of 1000 lbs of pyrogenic silica per batch for the sealant/adhesive process. A batch of silicone grease uses 575 lbs of pyrogenic silica per batch, so $575/1000 \times 0.38 = 0.2$ lbs/batch actual emissions.



On a potential to emit basis the batch cycle is 8 hours. At three batches per day the potential to emit is 3 X 0.2 lbs/batch = 0.6 lbs per day. Again this potential to emit is below the de minimus requirements.

We have brought payments current on the boilers and afterburners.

We would be happy to review this information with you if you have any further questions.

Thank you,

A handwritten signature in black ink that reads "Doug McKinzie". The signature is written in a cursive style with a large, stylized "D" and "M".

Doug McKinzie
Co-President
Novagard Solutions