



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**

VIA E-MAIL TO JAMES MUELLER, PE

June 7, 2007

Charles Staresina
Pro-Tec
950 East 69th Street
Cleveland, Ohio 44103

FACILITY ID: 13-18-00-7979

RECEIPT OF CORRECTIVE ACTION PLAN: Notice of Violation for operating an emissions unit without first obtaining a permit-to-install and improper record keeping

Dear Mr. Staresina:

On May 25, 2007, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requesting that Protec submit a PTI application and a corrective action plan for record keeping violations. CDAQ is in receipt of an e-mail notification dated June 6, 2007. You are expected to comply with responding to the NOV by June 25, 2007. 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.

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 Valencia White at (216) 664-2953. All correspondence with CDAQ must include the Ohio EPA facility identification number for Protec: 13-18-00-7979.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

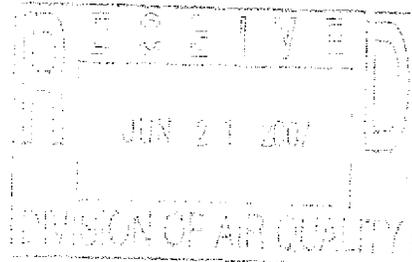
GB/vw

cc: James Mueller, Poly Science Engineering Group., Inc. (via e-mail)
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\1318007979\2007-05-25 RCAP.doc



86 North Main St., Chagrin Falls, Ohio 44022 • Phone 440-247-5801 • FAX 440-247-0901

June 19, 2007



Ms. Valencia White
Cleveland Air Quality District
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080

Re: Compliance Plan and PTI for Pro-Tec, Inc., 950 East 69th Street, Cleveland,
Ohio 44103 (OEPA ID # 13-18-00-7979)

Dear Ms. White:

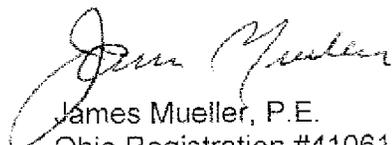
Please find attached both a copy of Pro-Tec's Compliance Plan and a new synthetic minor PTI for their K001 miscellaneous metal parts spray coating line at 950 East 69th Street in Cleveland, Ohio (OEPA ID # 13-18-00-7979).

Maximum Potential to Emit (MPTE) calculations show that Pro-Tec is either very close to 100 tpy of a criteria pollutant (VOC) or slightly over 100 tpy (as in the case of PM). Accordingly, Pro-Tec would request FESOP limits in their operation to allow them to be synthetic minor status (see attached letter).

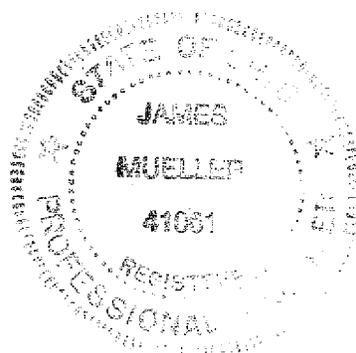
Because most of Pro-Tec's paints are below the 3.5 lbs VOC/gal limit contained in OAC Section 3745-21-09, they should have little difficulty in keeping below the 3.5 lbs VOC/gal limit which allows them unlimited gallons per day of painting. By FESOP limiting their emissions for VOC, PM, individual HAP and total HAP to below Title V threshold limits, this PTI will allow them the flexibility to have a high hourly emission rate, but a non-Title V moderate annual emissions (both VOC and PM FESOP limited to less than 20 tpy, individual Hap below 9.5 tpy and total Hap's below 24 tpy). Please advise if air quality modeling is required.

Thanking you in advance for your kind cooperation in this matter.

Sincerely,


James Mueller, P.E.
Ohio Registration #41061

JM: mh
Attachments



June 20, 2007

Ms. Valenca White
Cleveland Air Quality District
1925 St. Clair Avenue
Cleveland, OH 44114

Reference: Request for Synthetic Minor Status for ProTec's paint line at 950 E. 69th Street, Cleveland, OH 44103 (O.E.P.A. ID# 13-18-00-7979)

Dear Ms. White;

ProTec would like to request voluntary limits to our operation in order to achieve synthetic, minor status for our facility. In the attached permit application Poly Science has enumerated limits on VOC, PM, individual HAP and total HAPS which will give us the flexibility of high hourly emissions we need, but keeps us below Title V criteria limits.

Your help in this matter is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck S. Staresina". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chuck S. Staresina
Owner

Corrective Action Plan

Pursuant to CDAQ's NOV letter of May 25, 2007, Poly Science and Pro-Tec have jointly created and agreed on the following corrective action plans.

1) By Jun 25, 2007, Pro-Tec will submit a new PTI for their spray painting operation at 950 East 69th Street, Cleveland, Ohio. Poly Science would note that a PTO (now expired) was issued on October 6, 1995, and since Pro-Tec had a PTO, and started business in 1982 (not prior to 1974), there must have been a PTI issued at some point, but no one seems to be able to find it. Accordingly, it would be our recommendation that a new PTI be applied for to update for current information.

II) Poly Science will create a daily tracking sheet for paint sprayed.

- A) Code number for paint sprayed (ID the paint)
- B) Record the gallons of each coat sprayed
- C) Using the mass balance technique, record all VOC's and possible HAP's sprayed each day.
- D) Check to make sure that the avg. VOC's for the day are below 3.5 lbs. VOC/gal.
- E) All clean up material is MEK, which is no longer regulated and will not be tracked.

Almost all paints coated by Pro-Tec are below 2.9 lbs/gal VOC, but all will be tracked to prove compliance.