



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 #70022030000118088688
RETURN RECEIPT REQUESTED

April 23, 2010

Eugene Schoenmeyer
Abel Metal Processing, Inc.
2105 E 77th Street
Cleveland, OH 44103

FACILITY ID: 13-18-00-8036
THIRD RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION

Dear Mr. Schoenmeyer:

On January 20, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting Abel Metal Processing, Inc. (Abel) submit permits-to-install/operate (PTIO) applications within 30 days of the receipt of the letter.

Abel was alleged to be in violation of Ohio Revised Code 3704.05(F) and (G), Ohio Administrative Code 3745-31-02(A)(1) and the City of Cleveland Codified Ordinance 259.02 for operating emission sources without first applying for and obtaining a permit-to-install/operate (PTIO) for each of the following emission units:

- One 300 gallon Bright Nickel electroplating tank,
- One 80 gallon Bright Chrome plating tank (Trivalent),
- One 200 gallon Copper Electroplating tank,
- Two 300 gallon Electros-Nickel lines,
- One 80 gallon Aluminum Pickle tank,
- One 80 gallon Aluminum Cleaner tank,
- One 60 gallon Bright Dip tank,
- Two 400 gallon Electro polish tanks,
- One Electro less Nickel line and
- One Aluminum Pickle line

CDAQ is in receipt of a letter dated April 13, 2010, that provided emissions data to prove De Minimis status for state operating permits for each unpermitted emission unit located at Abel. The emission unit descriptions in the April 13, 2010, letter are different than the descriptions provided to CDAQ at the inspection performed on December 30, 2009. Below is the corrected list of emission units provided by Abel:

- Copper electro, 200 gallon sulfuric acid dip tank,



- 300 gallon Bright Nickel, MB-1. TVC-MS tank (Nickel Sulfate),
- 300 gallon Bright Chrome tank (TVC Base Compound, TVC Catalyst (TVC-MS), TVC Chromium Compound),
- 200 gallon Electroless Nickel tank (HS-N, HS-M, HS-R),
- 200 gallon Electroless Nickel tank(HS-N, HS-M, HS-R) ,
- 80 Gallon Aluminium Pickle tank (LASID #50),
- 60 Gallon Bright Dip tank (Sulfuric, nitric, water, salt),
- 150 Gallon Electropolish tank (#2500 Electropolish),
- 100 Gallon Muriatic Cleaner tank (Hydrochloric acid, water) and a
- 75 Gallon Muriatic Cleaner tank (Hydrochloric acid, water)

Criteria for City of Cleveland permits to operate are more inclusive than those of the State of Ohio. While the above emissions units are De Minimis by Ohio's criteria, upon reviewing the emissions data, CDAQ has determined that Abel 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. Please obtain 2006, 2007, 2008 and 2009 City of Cleveland permits-to-operate by submitting city permit fees within thirty (30) days of receipt of this letter to the following address:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plaza 2nd 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 Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Abel Metal Processing, Inc.: 13-18-00-8036.

Sincerely,

Linda Jimmy for G.B.
George Baker
Chief of Enforcement, CDAQ

GB/ak

cc: Facility File and L:\Data\Facilities\1318008036\2009-12-30 RCAP3.doc

encl: City permit fee invoices for 2006, 2007, 2008 and 2009