



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 4567
RETURN RECEIPT REQUESTED

January 11, 2010

Larry Harville
Satellite Dry Cleaners
3528 East 131st Street
Cleveland, Ohio 44120

NON-HPV
EMISSIONS VIOLATION

FACILITY ID: 13-18-00-8070

NOTICE OF VIOLATION: Failure to comply with terms and conditions of permit-to-install (PTI) #13-3247 and failure to submit a Permit-to-Operate (PTO) application for D001

Dear Mr. Larry Harville:

On December 18, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Satellite Dry Cleaners located at 3528 East 131st Street 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.

Satellite Dry Cleaners failed to submit a PTO application as specified in PTI #13-3247 within 30 days after commencing operation of emission unit (EU) D001: Permac Flex M40. This is a violation of Ohio Revised Code (ORC) Section 3704.05(C) and Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(b).

During the compliance inspection, utilizing a halogenated hydrocarbon detector, CDAQ detected a door gasket, filter housing, and filter gasket leaking perchloroethylene (PERC) on EU D001, which is in violation of PTI#13-3247(C)(1), Title 40 Code of Federal Regulations (CFR) Subpart M Section 63.322(k), and OAC Rule 3745-21-09(AA)(1)(e).

Satellite Dry Cleaners has also failed to:

Perform and record weekly perceptible leak checks, which is in violation of PTI #13-3247 (C)(1), Title 40 CFR Subpart M Section 63.322(k), and OAC Rule 3745-21-09(AA)(3) and (4)(b)(iv);



Conduct a monthly leak check using a halogenated hydrocarbon detector, which is in violation of Title 40 CFR Subpart M Section 63.322(k), and 63.322(o)(1)(i);

Record the monthly PERC usage, which is in violation of PTI#13-3247 (D)(1)(b), and Title 40 CFR Subpart M Section 63.324(d)(1);

Record the rolling 12-month average PERC usage, which is in violation of PTI#13-3247 (D)(1)(c), and Title 40 CFR Subpart M Section 63.324(d)(2);

Maintain records of 5 years of PERC purchases, which is in violation of PTI#13-3247 (D)(1)(a), and Title 40 CFR Subpart M Section 63.324(d);

Measure and record weekly the exhaust temperature on the outlet of the refrigerated condenser which is in violation of PTI#13-3247 (C)(2), and Title 40 CFR Subpart M Section 63.323(a)(1);

Record the amount, in pounds, of clothes dry cleaned with PERC, from January 1 to December 31 of each year, which is in violation of PTI#13-3247 (D)(2)(b), and OAC Rule 3745-21-09(AA)(4)(d).

In addition, Satellite Dry Cleaners is in violation of the City of Cleveland's Codified Ordinance Chapters 259.01, and 263.01 for failing to obtain 2007 and 2008 city permits by submitting city permit fees.

At the time of inspection Satellite Dry Cleaners was unable to present any monitoring or recordkeeping requirements. Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Satellite Dry Cleaners submit a Permit to Install/Operate (PTIO) application and Emissions Activity Category (EAC) Form for EU D001, within 30 days of receipt of this letter to CDAQ at the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that Satellite Dry Cleaners:

Submit copies of the invoices for the three gaskets that are to be replaced, and also the dates on which installation occurs;

Submit a copy of the halogenated hydrocarbon detector purchase invoice;

Submit a copy of a sample of the weekly perceptible leak checks;

Submit a copy of a sample of the pounds of clothes dry cleaned with PERC;



Submit a copy of a sample of the monthly PERC usage, and rolling 12 month PERC usage;

Submit a copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser.

Submit all of the above within 30 days of receipt of this letter to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also requests that Satellite Dry Cleaners obtain 2007 and 2008 city permits by submitting city permit fees, within 30 days of receipt of this letter to CDAQ at the following address:

City Permit Fee Invoices
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within thirty (30) 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.

The appropriate permit application(s) and supplemental form(s) are included with this letter. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

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.ohio.gov/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 Bryan Sokolowski at (216) 491-8644. All correspondence with CDAQ must include the Ohio EPA facility identification number for Satellite Dry Cleaners: 13-18-00-8070.

Sincerely,

Grinda Kimmy for G.B.
George Baker
Chief of Enforcement

GB/BS

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008070\2009-12-18 NOV.docx

encl: 2010 Dry Cleaning Calendar, PTIO Application, EAC Form, and City Permit Fee Invoices for 2007 and 2008