



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
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 3836
RETURN RECEIPT REQUESTED

May 23, 2008

Kyooohoo Sony
Laundryland Cleaners
11701 Superior Avenue
Cleveland, OH 44106

FACILITY ID: 13-18-00-8204

NOTICE OF VIOLATION: Failure to Obtain a Permit-to-Install and Permit-to-Operate for Union Dry-to-Dry Cleaning Machine, and Recordkeeping deficiencies

Dear Mr. Sony:

On May 19, 2008, the Cleveland Division of Air Quality (CDAQ) inspected Laundryland Cleaners located at 11701 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.

~~Permit-to-install (PTI) and permit-to-operate (PTO) applications were initially~~ submitted under the former owner of Laundryland for two machines in 1999. As identified in the applications, these two machines, a Vic 1050 and Multimatic 35, were not present at the facility during the inspection. Two Union machines were present, with one operating and with one non-operational. The date of installation of the two Union machines could not be determined during the inspection. You stated that you took over operations in 2004, and that you did not know when the dry cleaning machines were installed.

Laundryland Cleaners is operating a dry-to-dry, cleaning machine in violation of Ohio Administrative Code 3745-31-02(A) and 3745-35-02(A) respectively, and Ohio Revised Code 3704.05(F) and (G). Laundryland Cleaners has been operating without a PTI or PTO, since 2004.

Additionally, Laundryland Cleaners' operation violates the following rules of the Ohio Administrative Code 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)(a) The operator of a PERC dry cleaning facility shall keep a record of control equipment maintenance.

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.

OAC Rule 3745-21-09(AA)(4)(d) The operator of a PERC dry cleaning facility shall keep a record of the annual PERC usage in gallons and annual amount of fabric dry cleaned in pounds.

Furthermore, Laundryland Cleaners 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:

§ 63.322(e)(k), (l), and (m)

§ 63.323(a)(1)(i); (a)(2)(i) and (ii); and (d)(1) thru (d)(3)

§ 63.324(a)(1) thru (a)(5); (b)(1) thru (b)(3); and (d)(1) thru (d)(5)

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Laundryland Cleaners submit the applicable permit applications, submit the applicable EPA notification requirements, and 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.



Please note that all permit application(s) 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.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\1318008204\2008-05-23 NOV.doc

Encl: PTIO application and EAC form