



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 7010 1870 0000 6591 3981  
RETURN RECEIPT REQUESTED**

April 30, 2012

John Hall  
Superintendent, Wastewater Treatment Plant  
City of Euclid  
22201 Lakeshore Boulevard  
Euclid, OH 44123

**NON-HPV**

**FACILITY ID: Unassigned**

**LETTER OF WARNING: Operating an 800 kW Caterpillar natural gas-fired emergency electrical generator without a permit**

Dear Mr. Hall:

On April 20, 2012, the Cleveland Division of Air Quality (CDAQ) inspected the City of Euclid Wastewater Treatment Plant located at 22201 Lakeshore Boulevard in Euclid. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

The City of Euclid has been operating an 800 kW Caterpillar natural gas-fired emergency electrical generator since January 1, 1993 without applying for a permit. This is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(c) and Ohio Revised Code (ORC) Section 3704.05(F).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that the City of Euclid submit a Permit By Rule (PBR) Notification Form for the 800 kW Caterpillar natural gas-fired emergency electrical generator to the following enforcement representative:

Andrew Marantides  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839



A Permit By Rule (PBR) Notification Form is enclosed and can also be found online at <http://www.epa.ohio.gov/dapc/pbr/permitbyrule.aspx>.

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.

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.

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 Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the name and address of the City of Euclid Wastewater Treatment Plant.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/AMUK

cc: George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
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encl: Permit By Rule (PBR) Notification Form