



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 #70101870000065912045
RETURN RECEIPT REQUESTED**

January 19, 2012

Mark Palik
National Plating Corp.
6701 Hubbard Ave
Cleveland, OH 44127

NON-HPV

FACILITY ID: 13-18-00-8300

NOTICE OF VIOLATION: Failing to submit permit applications for emission units, failing to submit quarterly deviation reports, failure to keep proper records and failure to obtain city permits-to-operate by submitting city permit fees for calendar years 2006-2008

Dear Mr. Palik:

On December 19, 2011, the Cleveland Division of Air Quality (CDAQ) inspected National Plating Corp. (National) located at 6701 Hubbard 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.

National has failed to submit permit applications for four emission units: Second Barrel Line added in 2005 or 2006 and two Rack Lines added in 2010 as well as one Rack Line added in 2011. This is a violation of Ohio Revised Code (ORC) 3704.05(F) and Ohio Administrative Code (OAC) rule 3745-31-02 (A).

Also National has failed to submit quarterly deviation reports as required by Permit-to-Install (PTI) #13-03818, for Emission Unit P001: Hubbard Barrel Line (P001) which is a violation of ORC 3704.05(C) and OAC rule 3745-15-03(C).

In addition National has failed to keep proper records as required by PTI# 13-03818 Part II (C) 2. for P001. This is a violation of ORC 3704.05(C).

Furthermore, National has failed to obtain city permits-to-operate by submitting city permit fees for the calendar years 2006-2008.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that National



submit Permit-to-Install/Operate (PTIO) applications for the Second Barrel Line and three Rack Lines as well as an updated application for P001 to the following address:

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

CDAQ requests that National begin keeping records in accordance with PTI#13-03818 Part II (C) 2. for P001 and submit a copy of an example of said record keeping to the following enforcement agent:

Andrew Kenney
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.

CDAQ, also requests National begin submitting quarterly deviation reports beginning with the report due on April 30, 2012, covering from the date this letter is received to the date of submittal, as well as any other deviation reports as required by PTI#13-03818.

Furthermore, CDAQ requests that National obtain city permits-to-operate by submitting city permit fees for calendar years 2006, 2007 and 2008 within 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

The appropriate city 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.

PTIO Applications can be found at <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. 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.



PTIO applications may also be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for National Plating Corp.: 13-18-00-8300.

Sincerely,

Linda Kimmy

Field Enforcement Manager

LK/ak

- 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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