



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
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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL #70101870000065912151
RETURN RECEIPT REQUESTED

May 10, 2012

Mark Palik
President
National Plating Corporation
6701 Hubbard Ave
Cleveland, OH 44127

FACILITY ID: 13-18-00-8300
NOTICE OF VIOLATION FOLLOW-UP LETTER

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. On January 19, 2012, CDAQ issued a Notice of Violation notifying National that they were operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

National had 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 was a violation of the Ohio Revised Code (ORC) 3704.05(F) and the Ohio Administrative Code (OAC) Rule 3745-31-02 (A).

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

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

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

CDAQ requested a response within thirty (30) days of receipt of the January 19, 2012, Notice of Violation.

CDAQ received an extension request on February 10, 2012. CDAQ granted an extension until March 26, 2012, in a Receipt of Corrective Action Plan letter (RCAP).

On March 26, 2012, CDAQ received a letter from National as well as permit-to-install/operate (PTIO) applications for EU P001, Second Barrel Line, Rack Line #1, Rack Line #2, Pickle/Passivation Line and a Bright Dip Line. However, these applications were



not complete and did not contain calculations for each emissions unit. On March 30, 2012, in a second RCAP CDAQ requested that National resubmit the applications showing the proper emissions calculations within thirty (30) days of receipt of the second RCAP.

CDAQ also requested in the second RCAP that National obtain city permits-to-operate by submitting city permit fees for the Second Barrel Line, Rack Line #1, Rack Line #2, Pickle/Passivation Line and Bright Dip Line, for the years each unit has operated within thirty (30) days of receipt of the Second RCAP.

In addition, in the second RCAP CDAQ required National to begin submitting quarterly deviation reports beginning with the report due on April 30, 2012, covering from the date the letter was received to the date of submittal, as well as any other deviation reports required by PTI#13-03818.

CDAQ received corrected PTIO applications on April 13, 2012, which determined that all of the emissions units located at National are "De Minimis" status. On May 3, 2012, CDAQ received a request for revocation of PTI#13-03818. CDAQ also received a quarterly deviation report for EU P001 on April 27, 2012. Furthermore, CDAQ received city permit fees on April 12, 2012, for the calendar years 2006-2008.

The corrective action plan was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

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 National Plating Corporation: 13-18-00-8300.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/ak *LK*

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008300\2011-12-19 NEAR.doc

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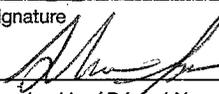
Mark Palik
President
National Plating Corp
6701 Hubbard Ave
Cleveland, OH 44127

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