



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 #70101870000065911963
RETURN RECEIPT REQUESTED**

November 21, 2011

Vanessa Y. Chandler
HDT Tactical Systems, Incorporated
30525 Aurora Road
Solon, OH 44139

NON-HPV

FACILITY ID: 13-18-53-1036

NOTICE OF VIOLATION : Failing to submit annual VOC report and failing to perform and record daily emissions checks

Dear Ms. Chandler:

On October 25, 2011, the Cleveland Division of Air Quality (CDAQ) inspected HDT Tactical Systems, Incorporated (HDT) located at 30525 Aurora Road in Solon. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

HDT has failed to submit a 2010 Volatile Organic Compound (VOC) Report as required by Permit-to-Install/Operate (PTIO) #P0105841 for emission units: K001: Conveyorized coating line which paints parts. System utilizes a dry filtration system and never exceeds 3 gal/day (K001), K002: Conveyorized coating line with HVLP gun, waterwash system, and followed by an infrared electric oven with a maximum of 500 degrees Fahrenheit (K002) and K003: Conveyorized coating line which paints parts. System utilizes a dry filtration system and never exceeds 3 gal/day(K003). This is also a violation of Ohio Revised Code (ORC) 3704.05 (C).

HDT also failed to perform and record daily visual emissions checks as required by PTIO #P0105841 for Emission Units K001 and K002, from the date of the issuance of PTIO#P0105841, April 27, 2010 to October 30, 2011, which is a violation of ORC 3704.05 (C). HDT has begun performing and recording daily visual emissions checks as required by PTIO #P0105841 as of October 31, 2011. CDAQ has determined that no further enforcement action is warranted at this time in regards to the visual emissions checks violation, but reserves its right to take such action in the future if necessary.

However, unless you undertake some type of corrective action with respect to the



above noted violation regarding submitting required reports, you will remain in non-compliance. CDAQ requests that HDT submit an annual VOC report for Emission Units K001, K002 and K003 as required by PTIO #P0105841 for calendar year 2010, to the following enforcement representative:

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

Or the report may be submitted electronically via eBusiness Center: Air Services.

Your 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, a written response that includes a timeline for correcting the alleged violations must be submitted within fourteen (14) days.

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 Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for HDT Tactical Systems, Incorporated: 13-18-53-1036.

Sincerely,

A handwritten signature in black ink that reads "Linda Kimmy".

Linda Kimmy
Field Enforcement Manager

LK/ak

cc: Kathy Roller, HDT Tactical Systems, Inc
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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