



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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 #70101870000065912007
RETURN RECEIPT REQUESTED

December 6, 2011

Rita Thomas
HDT Tactical Systems, Incorporated
30525 Aurora Road
Solon, OH 44139

FACILITY ID: 13-18-53-1036
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Ms. Thomas:

On November 21, 2011, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring HDT Tactical Systems, Incorporated (HDT) to submit an annual VOC report for Emission Units K001, K002 and K003 as required by PTIO #P0105841 for calendar year 2010. CDAQ is in receipt of an annual VOC report for Emission Units K001, K002 and K003 as required by PTIO #P0105841 for calendar year 2010 on December 2, 2011.

The corrective action was received in a timely manner 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 HDT Tactical Systems, Incorporated: 13-18-53-1036.

Sincerely,

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

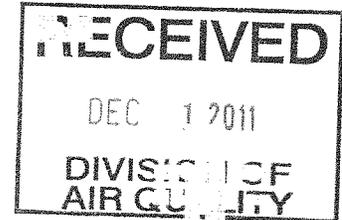
Linda Kimmy
Field Enforcement Manager, CDAQ

LK/ak

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318531036\2011-10-25 NEAR.doc

November 30, 2011

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



Re: Facility ID 13-18-53-1036
PTIO #P0105841

Dear Mr. Kenney:

In regards to HDT Tactical System (Facility ID 13-18-5-1036) Permit to Install/Operate (PTIO) #P0105841 requirement for submission of 2010 Volatile Organic Compound (VOC) Report as required, we are submitting the following information which is an annual summary of the daily logs for 2010.

OAC rule 3745-31-05(A)(3)

K001 total VOC emissions from this emissions unit as: **911# VOC** and 325 gallons paint used 2010
K003 total VOC emissions from this emissions unit as: **3267# VOC** and 1136 gallons paint used 2010
K002 total VOC emissions from this emissions unit as: **1053# VOC** and 356 gallons paint used 2010

All units are under the permit limits allowable for K001 and K003 (1.92 tpy) and (10.5 lbs./day) and K002 (12.78 tpy) and (70 lbs./day).

VOC emissions from cleanup materials are under the limit of 2.95 tpy (K002) and (K001/K003). An average 1/4 gallon of MEK is calculated for each gallon of paint used.

		1/4 gallon calculated	
	Gallons	clean up	tpy VOC
K001	325	81	0.27
K002	1136	284	0.95
K003	356	89	0.30

If you need any additional information, feel free to contact me at (216)438-6169.

Sincerely,

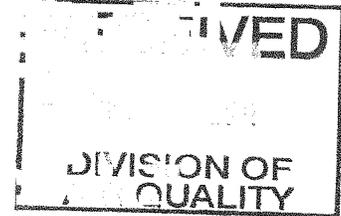
A handwritten signature in cursive script that reads "Kathy Roller".

Kathy Roller
Corporate EHS Manager

**VIA CERTIFIED MAIL # 7009 2250 0000 1480 3113
RETURN RECEIPT REQUESTED**

December 1, 2011

Ms. Linda Kimmy
Field Enforcement Manager
City of Cleveland
Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839



Re: HDT Tactical Systems, Inc.
Ohio EPA Facility ID: 13-18-53-1036
RESPONSE TO NOTICE OF VIOLATION

Dear Ms. Kimmy:

I am in receipt of your letter to Ms. Vanessa Chandler, dated November 21, 2011. Enclosed is the response of HDT Tactical Systems ("HDT") to that letter, including the notice of violation for failure to submit the 2010 Volatile Organic Compound (VOC) Report as required by HDT's Permit to Install/Operate (PTIO) #P0105841 for various emission units as enumerated in your letter.

On November 30, HDT submitted the VOC Report, as instructed, to Mr. Andrew Kenney, via certified mail #7010 1670 0000 7190 8768. I have enclosed a copy of the VOC Report with this letter.

HDT mistakenly believed that its Annual Permit Evaluation Report ("PER"), which it submitted in a timely fashion earlier this year, met the requirements of a VOC Report. The PER that was submitted indicated HDT did not exceed its emissions limitations. As you can see from the VOC Report, the facility continues to maintain emissions within limits of the permit.

The letter also states that HDT failed to perform and record daily visual emissions checks as required by the PTIO. During Mr. Kenney's audit of the facility, HDT representatives stated to Mr. Kenney that HDT had been, and continues to perform, daily visual emissions checks. HDT adjusted its recording practices during Mr. Kenney's visit to the specifications outlined by Mr. Kenney. HDT will continue to perform and record the daily visual emissions checks consistent with these specifications.

Please do not hesitate to contact me with any further questions.

Sincerely,

Rita A. Thomas
Vice President Corporate Legal

enclosure

November 29, 2011

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

Re: Facility ID 13-18-53-1036
 PTIO #P0105841

Dear Mr. Kenney:

In regards to HDT Tactical System (Facility ID 13-18-5-1036) Permit to Install/Operate (PTIO) #P0105841 requirement for submission of 2010 Volatile Organic Compound (VOC) Report as required, we are submitting the following information which is an annual summary of the daily logs for 2010.

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K001	325	81	0.27
K002	1136	284	0.95
K003	356	89	0.30

If you need any additional information, feel free to contact me at (216)438-6169.

Sincerely,


 Kathy Roller
 Corporate EHS Manager