



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
216/664-2297 • Fax: 216/470-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 3706
RETURN RECEIPT REQUESTED

October 17, 2008

David Cooley, Plant Manager
Heidtman Steel Products, Inc.
4600 Heidtman Parkway
Cleveland, OH 44105

FACILITY ID: 13-18-00-8401

NOTICE OF VIOLATION: FAILURE TO OBTAIN A PERMIT TO INSTALL AND
OPERATE FOR UNPAVED ROADWAYS

Dear Mr. Cooley:

On October 14, 2008, the Cleveland Division of Air Quality (CDAQ) investigated a dust complaint at Heidtman Steel Products, Inc. (Heidtman), located at 4600 Heidtman Parkway 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.

During the investigation, a CDAQ representative witnessed the generation of particulate matter (PM) from vehicular traffic transporting steel coils in and out of field storage areas. You stated that traffic on these unpaved areas, which totals 11 acres, happens approximately 16 hours per working day and that no dust control methods (i.e. watering of roadways) are employed for suppressing fugitive dust.

Heidtman's operation of an emissions source without applying for a permit to install and operate (PTIO) is in violation of Ohio Administrative Code (OAC) 3745-31-02(A), and Ohio Revised Code 3704.05(F) and (G). Furthermore, Heidtman is in violation of OAC Rule 3745-17-08(B), for not addressing reasonably available control measures to minimize airborne dust.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Heidtman submit appropriate permit applications for unpaved roadways to the following enforcement representative:

Valerie Shaffer
Cleveland Division of Air Quality
1925 St. Clair Avenue NE
Cleveland, Ohio 44114-2080

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.



Appropriate permit application(s) and supplemental form(s) can be obtained from the Ohio EPA's website. Please note that a model general permit for unpaved roadways may be applicable to Heidtman.

CDAQ has included documents with this letter providing information on Ohio EPA's Air Contaminant Source Permit-to-Install and Operate (PTIO) Program and an overview of Ohio EPA's General Permit Program. 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.

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.state.oh.us/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. 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. Should you have any questions, please call Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for Heidtman: 13-18-00-8401.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/vls

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318008401\2008-10-14 NOV.doc

encl: Ohio EPA Fact Sheet: Air Contaminant Source Permit-to-Install and Operate (PTIO) Program
Ohio EPA General Permit Program Overview

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Heidtman Steel Products Inc
ATTN: Dave Cooley
4600 Heidtman Pkwy
Cleveland, OH 44105

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature
x *Mia Johnson Diaz* Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery
Mia Johnson Diaz *10/24/08*

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

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