



City of Cleveland

Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 4673
RETURN RECEIPT REQUESTED

August 20, 2009

Gregory Hadgis
Areway, LLC
8525 Clinton Rd.
Brooklyn, OH 44144

NON-HPV: REPORTING VIOLATION

FACILITY ID: 13-18-10-5884

NOTICE OF VIOLATION: Failure to Submit Ongoing Compliance Status Reports for Emissions Unit P007

Dear Mr. Hadgis:

On July 28, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Areway, LLC (Areway) located at 3700 Ridge Road and 8525 Clinton Road in Brooklyn. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations or air permit conditions.

Areway's operation of emissions unit P007: Decorative Chrome Plating Line, is in violation of issued PTI #13-03335, 40 Code Federal Regulations (CFR) 63 Subpart N, and Ohio Revised Code (ORC) Section 3704.05 (C) and (G), in that semiannual ongoing compliance status reports have not been received by CDAQ for the following time periods: 2nd half 2007, 2008 and 1st half 2009.

Areway is currently permitted as a Title V facility. State permits-to-install/operate (PTIOs) need to be issued for emissions unit P007 and emissions unit L005: Open Top Vapor Degreaser, as necessary, to facilitate Areway's request for removal from the Title V permitting program.

Additionally, Title V facilities were required to start submitting quarterly deviation reports electronically via Ohio EPA's Air Services beginning with the fourth quarter of 2008. Areway has submitted deviation reports via postal mail during 2009.

CDAQ requests that Areway electronically submit past semiannual ongoing compliance status reports for P007 via Air Services.



CDAQ is also requests that Areway submit a corrected Title V Compliance Certification for 2008 via Air Services that accurately identifies each deviation of applicable requirements for insignificant emissions units (i.e. P007). A copy of the Title V compliance certification instructions are enclosed for your review.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. Please submit a written response to this letter to the following enforcement representative:

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

Your written response 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 state permit applications and supplemental forms can be found on Ohio EPA's website at <http://www.epa.state.oh.us/dapc/permits/permits.html>. Please note that PTIOs for Title V facilities are required to be submitted via Air Services.

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 Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for Areway: 13-18-10-5884.

Sincerely,

George Baker
Chief of Enforcement

GB/vls

cc: Ken Jordan, Areway, LLC
Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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encl: Title V Compliance Certification Instructions