



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
216/654-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 3416
RETURN RECEIPT REQUESTED

8/21/08

Robert Scanlon, President
North American Manufacturing Co., Ltd.
4455 E. 71st St.
Cleveland, OH 44105-5600

FACILITY ID: 13-18-17-3445
NOTICE OF VIOLATION: Visible Emissions Exceedance

Dear Mr. Scanlon:

On 8/8/08, the Cleveland Division of Air Quality (CDAQ) inspected North American Manufacturing Co., Ltd. (NAMCO) located at 4455 E. 71st St. 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.

On 8/8/08, CDAQ inspectors observed dense white smoke emitting from a smokestack on the north side of the NAMCO's facility. Method 9 opacity test observations were conducted and the visible emissions were determined to be in excess of 20% opacity for a six minute average. This is a violation of the Ohio Administrative Code (OAC) Rule 3745-15-07 and OAC Rule 3745-17-07, the Ohio Revised Code (ORC) 3704.05(A) and the City of Cleveland Codified Ordinance (CCO) Title V, Chapter 265.01.

Facility contact was established with Don Horwath, Maintenance Foreman and subsequent investigation revealed that Furnace F8 (Emissions Unit B008, listed as a de minimis source per OAC 3745-31-03(A)(1)(cc)) was being used to test glycerine for viability as a fuel source. Testing was discontinued upon CDAQ's request.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that NAMCO submit a corrective action plan that details procedures to monitor and control visible emissions when conducting fuel testing operations to the following enforcement representative:

Dave DeChant
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.

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. 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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for North American Manufacturing Co., Ltd.: 13-18-17-3445.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/dd

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318173445\2008-8-21 NOV.docx

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:

Robert Scanlon, President
 North American Manufacturing Co., Ltd.
 4455 E. 71st St.
 Cleveland, OH 44105-5600

2. Article Number
(Transfer from service label)**COMPLETE THIS SECTION ON DELIVERY**

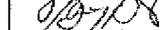
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