



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue Plaza, Suite 200
Cleveland, Ohio 44114-1839
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www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7003 1010 0004 2923 6509
RETURN RECEIPT REQUESTED**

10/3/11

Cliff Brehm
Automated Packaging Systems, Inc.
13555 McCracken Rd.
Garfield Heights, OH 44125

FACILITY ID: 13-18-22-6136

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to electronically submit required annual, semi-annual and quarterly reports since the 4th quarter of 2008; Failure to maintain the individual rolling 12-month volatile organic compound (VOC) emission summary for Emissions Unit (EU) K016 (formerly K013)

Dear Mr. Brehm:

On 8/2/11, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requesting that Automated Packaging Systems, Inc. (Automated) electronically submit all required annual, semi-annual and quarterly reports dating back to the first quarter of 2008 through the State of Ohio EPA's eBusiness site, and submit a Permit to Install/Operate (PTIO) application specific to the planned laminating process that is to be added to the existing slitter operation.

CDAQ is in receipt of a letter dated 9/26/11 confirming electronic submission of the requested reporting; a sample of the modified record keeping for EU K016; and a statement indicating that a PTIO application was being prepared for the proposed lamination process.

A review of the Ohio EPA's Stars II database confirmed submission of the required reporting for 2009, 2010 and 2011. Although hard copy submission of required reporting was received in 2008 you are still required to submit the records for the 4th quarter electronically. Additionally, there is an error in the 1st Quarter, 2010 Deviation Report. Although the data appears accurate and the dated signatures are for 4/30/10, the header states "1st Quarter 2009".

You are expected to comply with electronically submitting required reporting for 4th quarter 2008; re-submit a corrected 1st Quarter 2010 Deviation Report and submit the PTIO application for the planned laminating process by 10/31/11. Additional time is available for the PTIO application as long as no installation is made prior to receiving an approved PTIO. Please provide notification of the completed electronic report submissions. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action.



Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter to the following enforcement representative:

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

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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Automated Packaging Systems, Inc.: 13-18-22-6136.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/dd

cc: Paul Banfield, Automated
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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