



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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Cleveland, Ohio 44114-1839
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7010 1870 0000 6591 2441
RETURN RECEIPT REQUESTED**

11/2/11

Cliff Brehm
Automated Packaging Systems, Inc.
18555 McCracken Rd.
Garfield Heights, OH 44125

FACILITY ID: 13-18-22-6136

NOTICE OF VIOLATION FOLLOW-UP LETTER: 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 received 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.

Subsequent to a review of the electronic records CDAQ issued a Receipt of Corrective Action Plan (RCAP) requesting Automated to electronically submit 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.

On 10/26/11 CDAQ received an email notification from Automated indicating that the 4th Quarter Deviation Report for 2008 and the corrected 1st Quarter Deviation Report for 2010 had been electronically submitted. Automated also included a request for additional time to submit a completed PTIO application for the planned laminating process.

The corrective action plan 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.



As noted in the first RCAP, 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 submission of the completed electronic PTIO application when it is completed.

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

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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