



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
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Cleveland, Ohio 44114-2080  
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www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 70022030000118078764  
RETURN RECEIPT REQUESTED

March 11, 2009

Mr. Bryan Shaffer  
Production Manager  
McGean-Rohco, Inc.  
2910 Harvard Avenue  
Cleveland, Ohio 44105-3010

NON-HPV

FACILITY ID: 13-18-36-5229

NOTICE OF VIOLATION: Operational Restrictions, Monitoring and Recordkeeping Requirements and Reporting Requirements

Dear Mr. Shaffer:

On February 13 and 18, 2009, the Cleveland Division of Air Quality (CDAQ) inspected McGean-Rohco, Inc. (McGean) located at 2910 Harvard Avenue in Newburgh Heights. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions:

McGean's operation of Emission Unit (EU) P026: Two Glass-Lined Reactors, Two Reflux Condensers, Spray Dryer/Cyclone and Two Wet Scrubbers are in violation of PTI #13-04543 Part II (B) and (C) for failing to operate the reactor Venturi scrubber at a pH of 6 or above on February 28, 2008, failing to operate the dryer/cyclone Venturi scrubber at a pressure drop between 10 inches and 20 inches water across water column on various dates in the months of January, February, March, April and May, 2008, and failing to operate and maintain in good working condition the monitoring devices.

McGean's operation of EU P036: Polyvinyl Acetate Bead Reactor/Water Seal Pot is in violation of PTI #13-3577 Part I (A)(2) and Part II (C) for failing to report deviations and failing to properly record water seal pot flow rate on operations logs on February 5, 6, and 26, 2008, March 4, 2008, and May 19, 20, and 22, 2008.

McGean's operation of EU P037: Polyvinyl Acetate Bead Dryer with 4000 ACFM Baghouse is in violation of PTI #13-3578 Part I (A)(2) and Part II (C) for failing to report deviations and failing to record pressure drop readings on February 5 and 26, 2008, and May 19 and 22, 2008.



McGean's operation of EU P038: R-10 Multipurpose Reactor System with Condenser/Scrubber is in violation of PTI #13-04001 Part II (C) (1) (a) for failing to report scrubber water flow rate in gallons per minute.

McGean's operation of EU P039: 1000 Gallon Multipurpose Reactor R-7 with Condenser is in violation of PTI #13-04683 Part I (A) (2) and Part II (C) for failing to report deviations and failing to operate within parameters for pH when acidic air pollutants were controlled on December 10, 12, and 18, 2008.

In addition, McGean is in violation of Ohio Revised Code (ORC) Section 3704.05 (C) for failing to comply with the terms and conditions of issued permits.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that McGean submit a corrective action plan for the following:

- EU P026 - operate within the permitted parameters for pressure drop and pH and maintain the monitoring device in good working condition,
- EU P036 - record water seal pot flow rate and submit corrected deviation reports,
- EU P037 - correctly record pressure drop and submit corrected deviation reports,
- EU P038 - record scrubber water flow rate in gallons per minute (gpm) and provide a copy of these records, and for
- EU P039 - operate within permitted parameters for pH when acidic air pollutants are controlled and submit corrected deviation reports.

This information must be submitted to the following enforcement representative:

Linda Kimmy  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

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.