



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Eneview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-3297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 70022030000118087780
RETURN RECEIPT REQUESTED

March 30, 2009

Mr. Jitu Gandhi
McGean
2910 Harvard Avenue
Cleveland, Ohio 44105-3010

FACILITY ID: 13-18-36-5229
RECEIPT OF CORRECTIVE ACTION PLAN: NOTICE OF VIOLATION

Dear Mr. Gandhi:

On March 11, 2009, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that McGean operate within the permitted parameters for pressure drop and pH and maintain the monitoring device in good order for Emission Unit (EU) P026, record water seal pot flow rate and submit a corrected deviation report for EU P036, correctly record pressure drop and submit a corrected deviation report for EU P037, record scrubber water flow rate in gallons per minute (gpm) and provide a copy of these records for EU P038, and operate within permitted parameters for pH when acidic air pollutants are being controlled and submit a corrected deviation report for EU P039.

CDAQ is in receipt of a Corrective Action Plan dated March 24, 2009, which states a new pressure drop sensor has been installed on EU P026 and operator procedure review and training system improvements have been made, corrected deviation reports were submitted for EUs P036 and P037 with corrected dates, the procedures for recording scrubber flow rate were agreed upon with CDAQ and not changed for EU P038, and control system parameters have been reviewed and adjusted to assure the system operates within the range specified in the permit for EU P039.

However, McGean submitted a corrected deviation report for only EU P038, not EU P039, as requested.

You are expected to comply with submitting a corrected deviation report for EU P039 within 14 days of receipt of this letter. 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.



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 Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for McGean: 13-18-36-5229.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

VW/LK

cc: Mr. Bryan Shaffer, McGean
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318365229\2009-02-13 RCAP.doc

McGean
2910 Harvard Avenue
Cleveland, Ohio 44105-3010
216-441-4900
Fax 216-441-1377
www.mcgean.com



March 24, 2009

Ms. Linda J. Kimmy
Cleveland Div. of Air Quality
75 Erievue Plaza, Second floor
Cleveland, Ohio 44114-1839

Re: Your NOV letter dated March 11, 2009

Dear Ms. Kimmy:

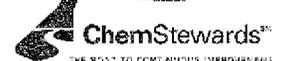
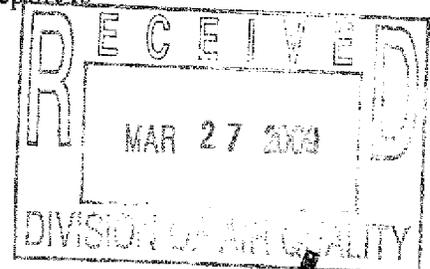
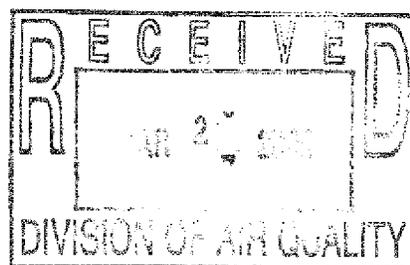
We have received your letter of NOV regarding your recent inspections. Our response to this letter is as below.

While we believe our systems were in place and working, it is agreed that the audit revealed some weaknesses, which we take very seriously, as our goal is to be in full compliance. Please note our responses below for each Emission Unit.

P026: Two Chrome Reactors and Spray Dryer. A new pressure drop sensor with improved design has been installed and tested. This in addition to the System Improvement mentioned below will meet the permit requirements.

P036: Polyvinyl Acetate Bead Reactor. Per the spreadsheet provided to you at time of audit, it appears that this parameter was not recorded properly by our operator on February 6th, March 4th and May 20th. The notice letter lists four additional dates; however, our review of these dates indicates that we were in compliance on these dates with emission unit P036. We would like you to review these dates to confirm our interpretation. As requested, a corrected deviation report is attached.

P037: Polyvinyl Acetate Bead Dryer. We have reviewed the compliance requirements with our operators and retrained them to follow the requirements. As requested a corrected deviation report is attached.



P038: R-10 Multipurpose Reactor System. According to the permit, one of the two options is to confirm the scrubber flow, verify the recirculation valve position and make-up water flow rate. We have followed this option and we believe we are in compliance with this requirement as these parameters are recorded on the Brightener Daily Records logsheet provided at the time of the audit.

P039: R-7 Multipurpose Reactor System. The pH is above the high end of the range on December 10th and 18th; however, on December 12th the operator indicated the unit was shutdown on the Brightener Daily Records logsheet provided at the time of the audit. The control system parameters have been reviewed and adjusted to assure the system operates within the range specified in the permit. As requested, a corrected deviation report is attached.

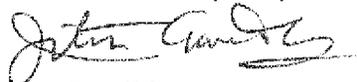
In order to improve our compliance monitoring, we have implemented following improvements.

System Improvements:

- 1) Procedure Review and Training of necessary personnel has been completed for all active emission units as indicated below:
 - a) all operational and reporting requirements are understood
 - b) understand what actions to take in the event of a deviation
 - c) recording and reporting of deviations

Please let me know if you have any questions.

Sincerely,
McGean-Rohco, Inc.,



Jitu Gandhi
EHS&S Manager

cc B. Shaffer

McGean
2910 Harvard Avenue
Cleveland, Ohio 44105-3010
216-441-4900
Fax 216-441-1377
www.mcgean.com



March 24, 2009

Mr. David Hearne
Chief of Engineering
CITY OF CLEVELAND
Bureau of Air Pollution Control
1925 St. Clair Avenue
Cleveland, Ohio 44114

Dear Mr. Hearne:

Re: Revised Annual notification for OEPA permit 1318365229- P035, P036 and P037

Following is a brief description of each of these processes during the year 2008:

Process P035 – Bead Grinder: This unit is used for grinding oversized beads from the dryer (P037) process; this unit was not used during the year 2008.

Process P036 – PVA Bead Reactor: We have a process batch sheet which has a line item for the operator to monitor and record the water flow through the seal pot. On three instances, February 6th, March 4th, and May 20th, our operator failed to record the flow rate one of the two times it is required during the batch. We have addressed the issue through retraining.

P037 – PVA Bead Dryer: The dryer unit was operating well within the operating range of the permit conditions. On four instances, February 5th and 26th, May 19th and 22nd, our operator failed to record the pressure drop during the batch. We have addressed the issue through retraining.

We hope by means of this letter we have satisfied annual notification through the year 2008 for above three processes.

If you have any questions or suggestions, please let me know.

Very truly yours,
McGean-Rohco, Inc.,

A handwritten signature in black ink, appearing to read 'Jitendra Gandhi', written over a horizontal line.

Jitendra Gandhi
Environmental, Health & Safety Manager

YKUREVBD309.doc



McGean
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Cleveland, Ohio 44105-3010
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Fax 216-441-1377
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March 24, 2009

Mr. David Hearne
Chief of Engineering
CITY OF CLEVELAND
Bureau of Air Pollution Control
1925 St. Clair Avenue
Cleveland, Ohio 44114

Dear Mr. Ang:

Re: Revised Annual notification for OEPA Permit (PTO) for PTI 13-04001 (PO38).

This permit **PTI 13-04001 (PO38)** is for a R-10 Multi-purpose 6000 gallon Stainless Steel 6000 Gallon reactor system at our facility on 2910 Harvard Avenue.

Regarding the deviation reporting, following an audit, a closer inspection of our records indicated occasionally our pH is slightly outside the range specified in the permit. While it is not believed this would have a significant affect on emissions, it was corrected by review and adjustment of the control system parameters.

We hope by means of this letter we have satisfied notification through the year 2008 for Process P038.

If you have any questions or suggestions, please let me know.

Very truly yours,
McGean-Rohco, Inc.,

A handwritten signature in black ink that reads "Jitendra Gandhi".

Jitendra Gandhi
Environmental, Health and Safety Manager

cc: B. Shaffer

YRLYNOR10.109.D0C
MEMOENY



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:

BRYAN SHAFFER, PRODUCTION MGR.
McGean-Rohco
2910 HARVARD AVENUE
CLEVELAND, OH 44105-3010

2. Article Number

(Transfer from service label)

7002 2030 0001 1807 8764

PS Form 3811, August 2001

Domestic Return Receipt

102695-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Handwritten Signature]

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

3-13-9

- D. Is delivery address different from item 1? Yes
- If YES, enter delivery address below: No

3. Service Type

- Certified Mail
- Express Mail
- Registered
- Return Receipt for Merchandise
- Insured Mail
- C.O.D.

4. Restricted Delivery? (Extra Fee)

- Yes



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 Linda Kimmy at 216-664-2985. All correspondence with CDAQ must include the Ohio EPA facility identification number for McGean: 13-18-36-5229.

Sincerely,

Valencia White
Field Enforcement Manager, CDAQ

VW/LK

cc: Jitendra (Jitu) Gandbi, EHS & S, McGean
Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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