



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL #70093410000219389742
RETURN RECEIPT REQUESTED

September 15, 2010

Richard Brown
Southwest General Health Center
18697 Bagley Road
Middleburg Heights, OH 44130

FACILITY ID: 13-18-39-4002
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Brown:

On August 26, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requiring Southwest General Health Center (Southwest) to submit a complete Title V Annual Compliance Certification for 2008 and 2009. However, upon further review it was discovered that the 2008 and 2009 Annual Title V Compliance Certificates were submitted completely and CDAQ acknowledges that Southwest has submitted a corrected date for their 2008 Title V Annual Compliance Certification.

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.

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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Southwest General Health Center: 13-18-39-4002.

Sincerely,

Linda Kimmy for G.B.

George Baker
Chief of Enforcement, CDAQ

GB/ak

cc: John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318394002\2010-8-12 NEAR.doc



13000 Cantrell Road • Little Rock, Arkansas 72223 • Phone 501.975.8100 • Fax 501.975.6789 • www.ecci.com

September 13, 2010

Mr. Andrew Kenney
Cleveland Division of Air Quality
75 Erievue Plaza 2nd Floor
Cleveland, Ohio 44114-1839

SEP 16 2010

**Re: Notice of Violation: Failing to submit a complete 2008 and 2009
Title V Annual Compliance Certification
Facility ID: 13-18-39-4002**

Dear Mr. Kenny:

On behalf of Southwest General Health Center (SGHC), ECCI has contacted the City of Cleveland Division of Air Quality to resolve the above referenced notice of violation. This letter explains how the violations occur and the corrective action taken.

SGHC has submitted 2008 and 2009 Title V Annual Compliance Certifications reporting no permit deviation prior to the due date. However, when the 2008 certification was submitted, the incorrect reporting period was selected. It should have been 2008 but 2009 was used.

On September 8, 2010, I contacted with Mr. David Hearne, Chief of Engineering at the City of Cleveland Division of Air Quality to discuss the corrective action to resolve the above referenced violation. Mr. Hearne mentioned that there is no attachment to the both certifications which resulted in the determination that the submission was incomplete. I explained that the client did not have any intermittent compliance or non-compliance condition during either reporting period. Therefore, no attachment was necessary to report the detail of the permit deviation. Mr. Hearne referred me to Mr. Roland Lacy who reviewed the certifications. I asked Mr. Lacey to provide me the form that our client should have submitted with the certifications. Later Mr. Lacey called and explained that the format of the form has been changed and there is not a box to check to report no deviations. Therefore, attachments were not required. He suggested resubmitting the 2008 Title V Annual Compliance Certification via Ohio EPA ebusiness air services by selecting the correct reporting year without attachment. Since no attachment was necessary, the 2009 Title V Annual Compliance Certification submitted on March 26, 2010 was complete.

As guided, our client resubmitted the 2008 Title V Annual Compliance Certification on September 10, 2010. The copy of the certification is attached to this letter.

Thank you for your consideration on this matter. Should you have any questions or require additional information, please contact Mr. Richard Brown at (216) 826-8420 or me at (501) 975-8100.

Sincerely,

ECCI

A handwritten signature in cursive script that reads "Akemi Bauer".

Akemi Bauer, P.E (New Mexico)
Senior Environmental Engineer

AB/ab

pc: Mr. Richard Brown – Southwest General Health Center

Attachment: 2008 Annual Compliance Certification

Title V Annual Compliance Certification 24144
Southwest General Health Center
1318394002
September 10, 2010

**Title V Annual Compliance Certification 24144
Southwest General Health Center
1318394002
September 10, 2010**

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the statements made in this Title V Compliance Certification, which I am submitting to Ohio EPA via the Ohio EPA's Air Services software on the date indicated in Air Services, are true, accurate and complete, based on information and belief formed after reasonable inquiry. In affirming the statements made in this compliance certification, I am not attesting that I have personally examined and am familiar with this facility's compliance with every permit term and condition covered by the certification period, I am only attesting that I have personally examined this Compliance Certification and am familiar with the information submitted herein as being true, accurate and complete based on information and belief formed after reasonable inquiry, as the Certification so states.

Account: 8061rb

Date/time submitted: Sep 10 2010, 12:27:53

**Note: A copy of this Title V Compliance Certification must be submitted (i.e., post marked) to the Administrator of the United States Environmental Protection Agency
c/o Director, Air and Radiation Division,
U.S. EPA Region 5,
77 W. Jackson Blvd., R-19J,
Chicago, Illinois 60604.
It is recommended that this compliance certification be sent by certified mail to U.S. EPA.**

Ohio EPA, Division of Air Pollution Control
Title V Annual Compliance Certification

Sep 10 2010, 12:35:50

Facility ID: 1318394002
Facility Name Southwest General Health Center
Submitted: Yes

Report ID 24144
Report Type Title V Annual Compliance Certification
Report Status Submitted

Reporting Period 2008
Submitted Date: Sep 10, 2010

1. Identification of Intermittent Compliance (IC)

Intermittent compliance may be identified through either the following table or by attaching the information below. When attaching a document in lieu of using the table below, the document must meet the required format and content requirements for annual certifications. You can download a 'Title V Compliance Certification' form that meets these requirements along with instructions and examples from the system's Reference Page. Except as indicated in this section, the Material Information Section below, or any attachments submitted in lieu of using this sections, submittal of this report shall indicate all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the reporting period identified above.

IC ID	EU ID	Emission Limitation/Control Measure or Permit Term No.	Compliance Method	Excursions/Deviations (one of the following must be provided)	
				Report Date of Those Documented Within Excursion/Deviation Reports Submitted to DO/LAA	Explain the Date, Nature, Duration, and Probable Cause of the Excursion/Deviation, as well as any Corrective Action Taken
No records found					

2. Any Material Information Not Established Through the Applicable Permit Terms and Conditions That May Indicate Non-Compliance

For each piece of material information, identify the emissions unit or briefly describe the requirement and then provide a description of the material information. For insignificant emissions units, include the permit number or SIP-based applicable requirement rule reference. If you are attaching a Title V Compliance Certification form that includes this information you do not need to duplicate it here.

3. Attachments

If you are attaching any previously submitted reports as part of this submittal, remember to also report the name and the date of the report.

Attachment ID	Description	Type	Modified By	Last Modified
No records found				