

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7010 0780 0001 1190 4483
RETURN RECEIPT REQUESTED

March 29, 2012

Joseph Woo
Brigh N Fresh Dry Cleaners
6521 Brecksville Rd.
Independence, OH 44131-4855

NON-HPV

FACILITY ID: 13-18-27-8241

SECOND NOTICE OF VIOLATION: Record keeping deficiency and failure to submit quarterly deviation reports

Dear Mr. Woo:

On December 27, 2011 and March 29, 2012, the Cleveland Division of Air Quality (CDAQ) inspected Bright N Fresh Dry Cleaners (Bright N Fresh) located at 6521 Brecksville Road in Independence. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

During the inspections, CDAQ discovered that Bright N Fresh failed to document the weekly solvent leak checks. These weekly solvent leak inspections should have been recorded since you bought the dry cleaning shop in June 2005. This is a violation of Ohio Administrative Code (OAC) 3745-21-09(BB)(4)(b)(iv), Permit-to-Install (PTI) No. 13-3657, Part II, C, 4 and Ohio Revised Code (ORC) Section 3704.05(C) and (G).

Bright N Fresh Dry Cleaners is required to submit quarterly deviation reports. These quarterly deviation reports should have been submitted since you bought the dry cleaning shop in June 2005. This is a violation of PTI No. 13-3657, Part I, A, 2 and ORC Section 3704.05(C).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Bright N Fresh submit begin recording your weekly leak inspections immediately. CDAQ will re-inspect your dry cleaning shop 30 days after receipt of this letter to verify that you started recording your weekly solvent leak checks. Please submit the 2011 fourth quarter deviation report within 30 days after receipt of this letter to the following address:



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

If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

CDAQ requests that Bright N Fresh submit an updated permit-to-install/operate (PTIO) application and a Dry Cleaning Facility emissions activity category (EAC) form. CDAQ needs an updated one on file for your facility. This is a requirement of OAC Rule 3745-31-02(A)(2) and ORC Section 3704.05(G). CDAQ requests that Bright N Fresh submit an updated PTIO application and EAC form within 30 days of your receipt of this letter to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plz., 2nd Fl.
Cleveland, OH 44114-1839

As an alternative to submitting printed forms and mailing them, PTIO applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

The appropriate permit application and EAC form No. 3846 may be downloaded from the Ohio EPA's website: <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

Permit-to-install/operate (PTIO) applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

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 \$25,000 or imprisonment for not more than one year, or both, for each violation.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.



OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA facility identification number for Bright N Fresh: 13-18-27-8241.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dlw

cc: 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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