



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
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 7011 2000 0002 6936 2740
RETURN RECEIPT REQUESTED**

July 25, 2012

Bruce Bailey
Vice President of Technical Affairs
Quasar Energy Group dba Collinwood BioEnergy, LLC
7624 Riverview Road
Cleveland, Ohio 44141

FACILITY ID: 13-18-00-8759

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Bailey:

On July 5, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requiring Collinwood BioEnergy, LLC to submit a corrective action plan addressing the emission of odors from its facility located at 13500 Aspinwall Avenue in Cleveland. The NOV was issued to Collinwood BioEnergy, LLC following an odor complaint received by CDAQ and a subsequent investigation conducted by CDAQ, on June 26, 2012. CDAQ's investigation determined that Collinwood BioEnergy, LLC was the source of the complained odors.

CDAQ is in receipt of a letter by Collinwood BioEnergy, LLC, dated July 17, 2012, stating that an operator circumvented the instrumentation and automated controls causing the membrane on the digester tank to rupture. The membrane was replaced on June 26, 2012. Your letter also acknowledged that plant employees conduct daily odor inspections and report the results of their findings.

Your response to the NOV 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.



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 Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for Collinwood BioEnergy, LLC: 13-18-00-8759.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

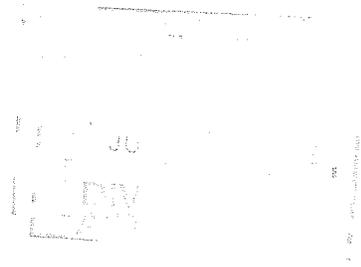
Valencia White
Chief of Enforcement, CDAQ

VW/vls LK

cc: Cam Rowley, Collinwood BioEnergy, LLC
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
L:\Data\Facilities\1318008759\2012-06-26 ROV + NEAR.docx

July 17, 2012

Valerie Shaffer
Cleveland Department of Health, Division of Air Quality
Ohio EPA Agency 13
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839



RE: Notice of Violation – July 5, 2012

Dear Ms. Shaffer:

We are in receipt of the NOV. We have replaced the damaged membrane which is the primary gas retention apparatus at the facility. Although there was a change in circumstance at the facility we returned to electric production within 72 hours.

1. The Problem: an operator circumvented the instrumentation and automated controls resulting in a ruptured dual membrane. This was unexpected and occurred on Sunday, June 24th. The gas membrane was replaced on Wednesday June 26th, the day of your inspection.
2. A daily odor inspection and reporting system is in place and the plant staff checks for odor at 6 reporting stations in the morning and evening. This process is in place at all quasar facilities.
3. No other protocol will change as a result of this event.

We do take issue with the NOV because although there was a change in smell it was not offensive as attested to by you and others visiting the plant on the 26th. This is an important factor as we were told 30 people at US Job Corps were vomiting and do not wish to take responsibility for the sensationalism now or in the future. We have spoken with Safety Officer Keith Campbell at Job Corps and provided emergency contact information for future concerns. In order to protect our reputation and maintain community relations we must object to the NOV. If someone would have identified themselves and objected at the time of the incident allowing us to confirm the objection we would take responsibility. I'm sure you are aware of other odor generating sources in the same area; we all need to diligently identify, address and rectify these sources as soon as possible.

Please review this information at your earliest opportunity and contact me with any questions or concerns. We are making daily efforts to be a good neighbor at this facility.

Thank you,

Bruce Bailey
Vice President of Technical Affairs