



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 3898
RETURN RECEIPT REQUESTED

May 15, 2008

Cheryl Browisky
CardPak, Inc.
26901 Solon Road
Solon, OH 44139

**HIGH PRIORITY FACILITY
HIGH PRIORITY VIOLATOR: GC7**

FACILITY ID: 13-18-53-8170
NOTICE OF VIOLATION : Failure to Conduct Timely Emissions Testing for K003

Dear Ms. Browisky:

On April 24, 2008, the Cleveland Division of Air Quality (CDAQ) inspected CardPak Inc. (CardPak) located at 29601 Solon Road in Solon. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

CDAQ has concluded that the applicable emissions stack testing for emissions unit K003, as required by CardPak's Title V permit, has not been conducted. The testing was required within six months of the Title V permit's expiration date. CardPak's Title V permit was effective on January 8, 2003 and expired on January 8, 2008. This is a violation of CardPak's Title V permit testing requirements, as cited in Part III, A. V. 1.c (i) of the permit, and Ohio Revised Code 3704.05 (C) and (J)(2).

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

Valerie Shaffer
Cleveland Division of Air Quality
1925 St. Clair Avenue NE
Cleveland, Ohio 44114-2080

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.

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.state.oh.us/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. 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 CardPak: 13-18-53-8170.

Sincerely,

George Baker
Chief of Enforcement, CDAQ

GB/vls

cc: Keith Gaydosh, Affinity Consultants
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318538170\2008 Inspection\2008-04-24 NOV.doc

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:

CARDBAK, INC.
ATTN: CHERYL BROWSKY
26901 SOLON ROAD
SOLON, OH 44139

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
 P. Lahman Addressee
- B. Received by (Printed Name) C. Date of Delivery
P. LAHMAN
- D. Is delivery address different from item 1? Yes
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3. Service Type
- Certified Mail Express
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D. (U.S.)

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7003 1010 0004 2923 3898

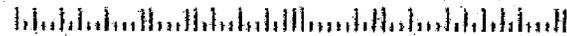
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DEPT OF PUBLIC HEALTH –
DIVISION OF AIR QUALITY
VALERIE SHAFFER
1925 ST. CLAIR AVENUE
CLEVELAND, OH 44114



**Superior Quality
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Guaranteed.**

Air Compliance

Testing, Inc.

P.O. Box 41156 Cleveland, Ohio 44141
1-800-EPA-AIR1 www.aircomp.com
testing@aircomp.com

June 5, 2008

Valerie Shaffer
City of Cleveland Division of Air Quality
1925 St. Clair Avenue
Cleveland, OH 44114

Dear Valerie:

This letter accompanies the attached Intent to Test (ITT) Notification Form that we have completed on the behalf of our client, Card Pak Inc., located in Solon, OH. The purpose of this emissions testing project is to satisfy Ohio EPA Title V permit emission testing requirements.

The scope of this testing project is to simultaneously measure Total Gaseous Nonmethane Organic Compounds (TGNMO) using EPA Method 25 from the Steineman Blister Pak Coater (K003) at the RTO Inlet Duct and Exhaust Stack during maximum achievable operations. This scope of work also includes verifying that the Permanent Total Enclosure (PTE) meets the requirements of EPA Method 204.

As is written in this ITT, a date of **July 10, 2008** has been selected as the test day with testing equipment set-up occurring on the day before. Typically Run No. 1's start time is targeted for 8:00 am. If this start time changes, Air Compliance Testing or facility personnel will contact you in advance to notify you of the new starting time.

If you have any questions regarding the scope of this testing project, the scheduled test day, or the process(es) being tested, please don't hesitate to call Mr. Jeffrey Browsky of Card Pak Inc. at 440-542-3358, or myself, and we would be happy to assist you in any way possible.

Thank you again for your careful consideration, and I am looking forward to working with you on this upcoming compliance testing project.

Sincerely,

Air Compliance Testing, Inc.

By: 
David B. Monro
Project Manager

cc: Mr. Jeffrey Browsky, Card Pak Inc.

INTENT TO TEST NOTIFICATION (One Emissions Unit Per Sheet)

Agency use only,
 Date Received _____
 Assigned _____

Facility Premise No. 1318538170
 Emissions Unit PTI No. 13-3834
 SCC Number 40201301

Proposed Test Date July 10, 2008
 Proposed Start Time 08:00

A. Facility Contact Information:

Name Card Pak Inc.
 Address 29601 Solon Rd., Solon OH 44139
 Contact Person Mr. Jeffrey Browisky
 Telephone (O) 440-542-3358 (Cell) 216-276-6544
 E-Mail jbrowisky@cardpak.com

Testing Firm Information:

Name Air Compliance Testing, Inc.
 Address PO Box 41156, Cleveland OH 44141-0156
 Contact Person Sin Hoi Chiew
 Telephone (O) 216 525-0900 (Cell) 440-821-7804
 E-Mail Sinhoi@aircomp.com

B. Test Location Information

Name Card Pak Inc.
 Contact Person Mr. Jeffrey Browisky

Address 29601 Solon Rd., Solon OH 44139
 Telephone (O) 440-542-3358 (Cell) 216-276-6544

C. Test Plan and Emissions Unit Information Table: List the applicable information under each respective column heading.

Emission Unit	StackID	Test Location	Control Equipment	Monitoring Equipment	Pollutant(s) to be Tested	EPA Test Method	Number of Sampling Points	Total Time per Test Run (min)	Number of Sampling Runs
3-Roll Steineman Skinpak and Blister Card Roll Coating Line (K003)	A	Regenerative Thermal Oxidizer Inlet Duct	Regenerative Thermal Oxidizer	Temperature	Stack Gas Velocity and Volumetric Flow Rate	1, 2, 3-Fyrite, and 4	16	60	3
3-Roll Steineman Skinpak and Blister Card Roll Coating Line (K003)	A	Regenerative Thermal Oxidizer Inlet Duct	Regenerative Thermal Oxidizer	Temperature	Total Gaseous Nonmethane Organics	25	1	60	3
3-Roll Steineman Skinpak and Blister Card Roll Coating Line (K003)	B	Regenerative Thermal Oxidizer Exhaust Stack	Regenerative Thermal Oxidizer	Temperature	Stack Gas Velocity and Volumetric Flow Rate	1, 2, 3-Fyrite, and 4	16	60	3
3-Roll Steineman Skinpak and Blister Card Roll Coating Line (K003)	B	Regenerative Thermal Oxidizer Exhaust Stack	Regenerative Thermal Oxidizer	Temperature	Total Gaseous Nonmethane Organics	25	1	60	3
3-Roll Steineman Skinpak and Blister Card Roll Coating Line (K003)	C	Enclosure	Permanent Total Enclosure	Pressure Drop	Permanent Total Enclosure	204	All NDOs	60	1

Are any modifications or alternatives as spelled within the test methods being proposed? **Yes [] No [X]** If "no", then no modifications or alternatives, however minor, will be accepted. If yes, list each test method and section being modified, and attach a detailed modification description and justification.

Source is testing to comply with (check all that apply): **Title V Permit**

D. What is the maximum rated capacity or throughput of the emissions unit given its permit-to-install or permit-to-operate? **K003 has a rated capacity of 4.6 - 4.8 lbs. per 1000 ft² coating at 6,600 sheets per hour (sheet size 28" x 40")**

Has the facility scheduled production or throughput so that the emissions unit can be operated at the maximum capacity given its permit-to-install or permit-to-operate during the test? **Yes [X] No []**

Specify how the operating rate will be demonstrated during the testing: **Normal facility process and recordkeeping procedures**

Sampling Location(s): **Inlet [X] Outlet [X] Simultaneous [X]** Will cyclonic flow check(s) be conducted? **Yes [X] No [] If potential to be physically possible exists.**

Fuel Sampling: **Coal-Proximate [] Ultimate [] Other [X] If other specify: N/A**

Emission Rate to be calculated using: **F-Factor [] Ultimate Coal Analysis [] Other [X] If other specify: As dictated by EPA Method 25 and 204 calculation algorithms**

Has any maintenance or parts replacement been performed on the emissions unit or the control equipment within the last year? **Yes [X] No [] If yes, briefly describe: Yearly preventative maintenance has been performed in accordance with the manufacturer's recommendations**

(Note: Some maintenance, such as installing new filter bags in a baghouse, or replacing the activated carbon in an adsorber, may disqualify the emissions unit from a performance test until a sufficient amount of time has elapsed to ensure a test which will be representative of normal operations.)

E. Sample Train Calibration: All affected measuring and monitoring equipment should be calibrated within 60 days of the scheduled testing.

THE FOLLOWING ADDITIONAL INFORMATION SHALL BE SUBMITTED AS ATTACHMENTS:

F. Sample Train Information:

1. A schematic diagram of each sampling train.
2. The type or types of capture media to be used to collect each gas stream pollutant. (Include filter specification sheets)
3. Sample tube type, (e.g., glass, teflon, stainless steel, etc.)
4. Probe cleaning method and solvent to be used, if applicable.

1. See attached sample train diagram.

2. Type or types of capture media: M1: N/A M2: N/A M204: N/A M25: Samples are collected utilizing a dry ice cooled stainless steel trap and an evacuated stainless steel tank. M3 - Fyrite: The Fyrite analyzer utilizes a chromium chloride-zinc chloride-hydrochloric acid solution for O2 absorption and a potassium hydroxide solution for CO2 absorption. M4: Samples are condensed in H2O and adsorbed onto Silica Gel.

3. Sample tube type: M1: N/A M2: N/A M204: N/A M25: Sample probe is made of stainless steel and the sample lines are made of Teflon. M3 - Fyrite: borosilicate glass or stainless steel with connecting borosilicate glassware. M4: borosilicate glass or stainless steel with connecting borosilicate glassware.

4. Probe cleaning method and solvent to be used: M1: N/A M2: N/A M204: N/A M25: N/A M3 - Fyrite: N/A M4: N/A

G. Laboratory Analysis:

A description of the laboratory analysis methods to be used to determine the concentration of each pollutant.

M1: N/A M2: N/A M204: N/A M25: TGNMO analysis of the condensate and the sample tank. The organic content of the condensate trap is determined by oxidizing the NMO to CO2 and quantitatively collecting the effluent in an evacuated vessel; then a portion of the CO2 is reduced to CH4 and measured by an FID. The Organic content of the sample tank fraction is measured by injecting a portion of the sample into a gas chromatographic column to separate the NMO from carbon monoxide (CO), CO2, and CH4; the NMO are oxidized to CO2, reduced to CH4, and measured by an FID. M3 - Fyrite: A Fyrite analyzer will be used for the analysis in a manner consistent with manufacturer's specifications. M4: A gas sample is extracted at a constant rate (or isokinetically in conjunction with other methods) from the source; moisture is removed from the sample stream and determined either volumetrically or gravimetrically.

H. Description of Operations:

- A description of any operation, process, or activity that could vent exhaust gases to the stack being tested. This shall include the description and feed rate of all materials capable of producing pollutant emissions used in each separate operation. Maximum process weight rate, or coating rate, and parameters such as line speed, VOC content etc. should be specifically documented with calculations to confirm worst case scenario emissions.

Note 1: All compliance demonstration testing shall be performed at maximum rate capacity as specified by the equipment manufacturer or at the maximum rate actually used in the emissions unit operation, whichever is greater, or at any other rate as agreed upon with Ohio EPA.

Note 2: If the emissions unit is not operated at maximum capacity, or as close as possible thereto, the emissions unit might be derated to the production capacity achieved during the test.

The only operations, processes, and/or activities that could vent exhaust gases to the test stack are those described above in this document.

I. Stack and Vent Description:

- A dimensional sketch or sketches showing the plan and elevation view of the entire ducting and stack arrangement. The sketch should include the relative position of all processes or operations venting to the stack or vent to be tested. It should also include the position of the ports relative to the nearest upstream and downstream gas flow disturbance or duct dimensional change. The sketches should include the relative position, type, and manufacturer's claimed efficiency of all gas cleaning equipment.
- A cross sectional dimensional sketch of the stack or duct at the sampling ports, showing the position of sampling points. In case of a rectangular duct, show division of duct into equal areas.
- For Fugitive emissions testing, a sketch illustrating the specific emissions points to be observed must be included.

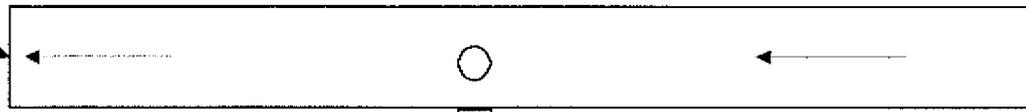
See attached stack drawings.

J. Safety:

Describe all possible safety hazards including such items as the presence of toxic fumes, high noise levels, areas where eye protection is required, etc. Note: Conditions considered unsafe at the time of the test will cause postponement.

The Plant requires the use of safety glasses, safety shoes, hard hats, and hearing protection (in designated areas). At this time, and to the best of our belief and knowledge, there are no toxic fumes or other hazards expected to be on site at this facility that would cause you to formally prepare for your exposure to them. It is our recommendation however, to consult plant personnel regarding its safety policies before accessing the production areas on this site. Air Compliance Testing personnel will be required to wear safety shoes and safety glasses at all times while on site at the facility to comply with our own company policy.

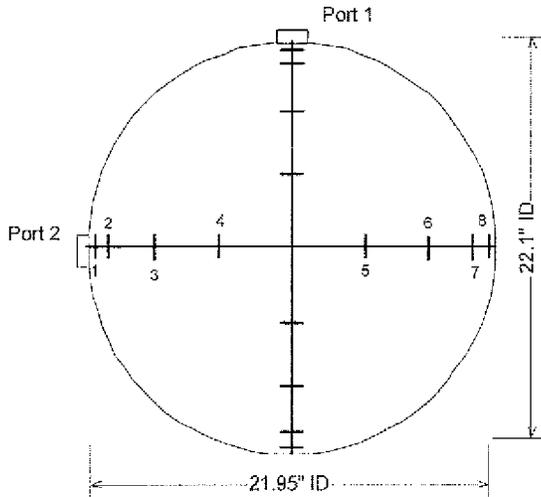
22.1" x 21.95" ID
Elliptical Duct



176.5"
7.99 Equivalent
Diameters Upstream
From Disturbance

1505.0"
68.11 Equivalent
Diameters Downstream
From Disturbance

(2) 3" ID Sampling
Ports Located 90°
Apart



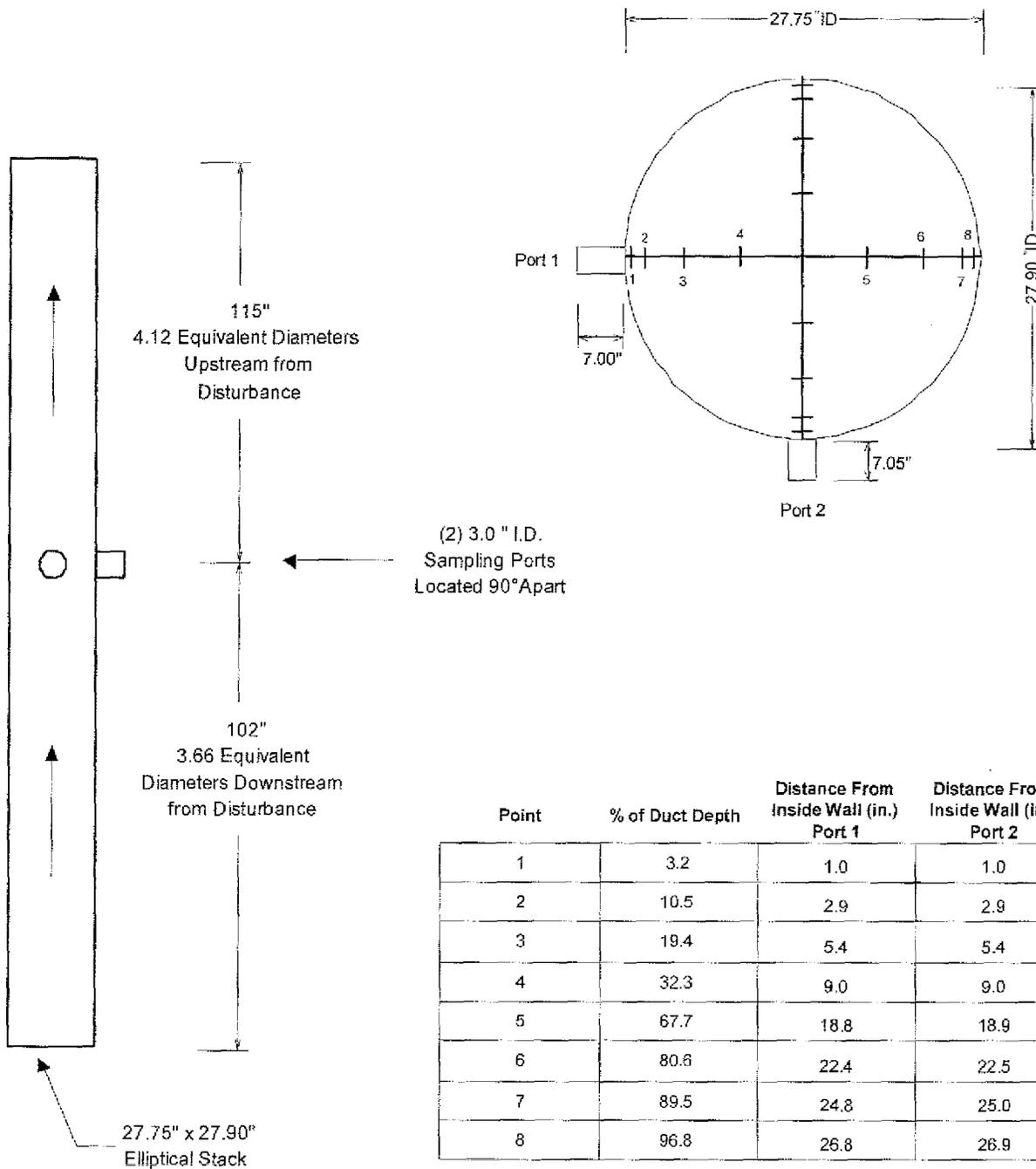
Point	% of Duct Depth	Distance From Inside Wall (in.) Port 1	Distance From Inside Wall (in.) Port 2
1	3.2	0.7	0.7
2	10.5	2.3	2.3
3	19.4	4.3	4.3
4	32.3	7.1	7.1
5	67.7	15.0	14.9
6	80.6	17.8	17.7
7	89.5	19.8	19.6
8	96.8	21.4	21.2

NOTES:
1. Not to scale
2. Dimensions subject to change upon verification.

No.	Revisions	Date	By
0	For Approval	5/5/08	DM

Air Compliance Testing, Inc.
P.O. Box 41156
Cleveland, Ohio 44141
www.aircomp.com
Phone: (800) 372-2471 Fax: (216) 525-0901

3-Roll Steineman
Skinpak and Blister Card
Roll Coating Line (K003)
Inlet Duct
Card Pak Inc.
Solon, Ohio



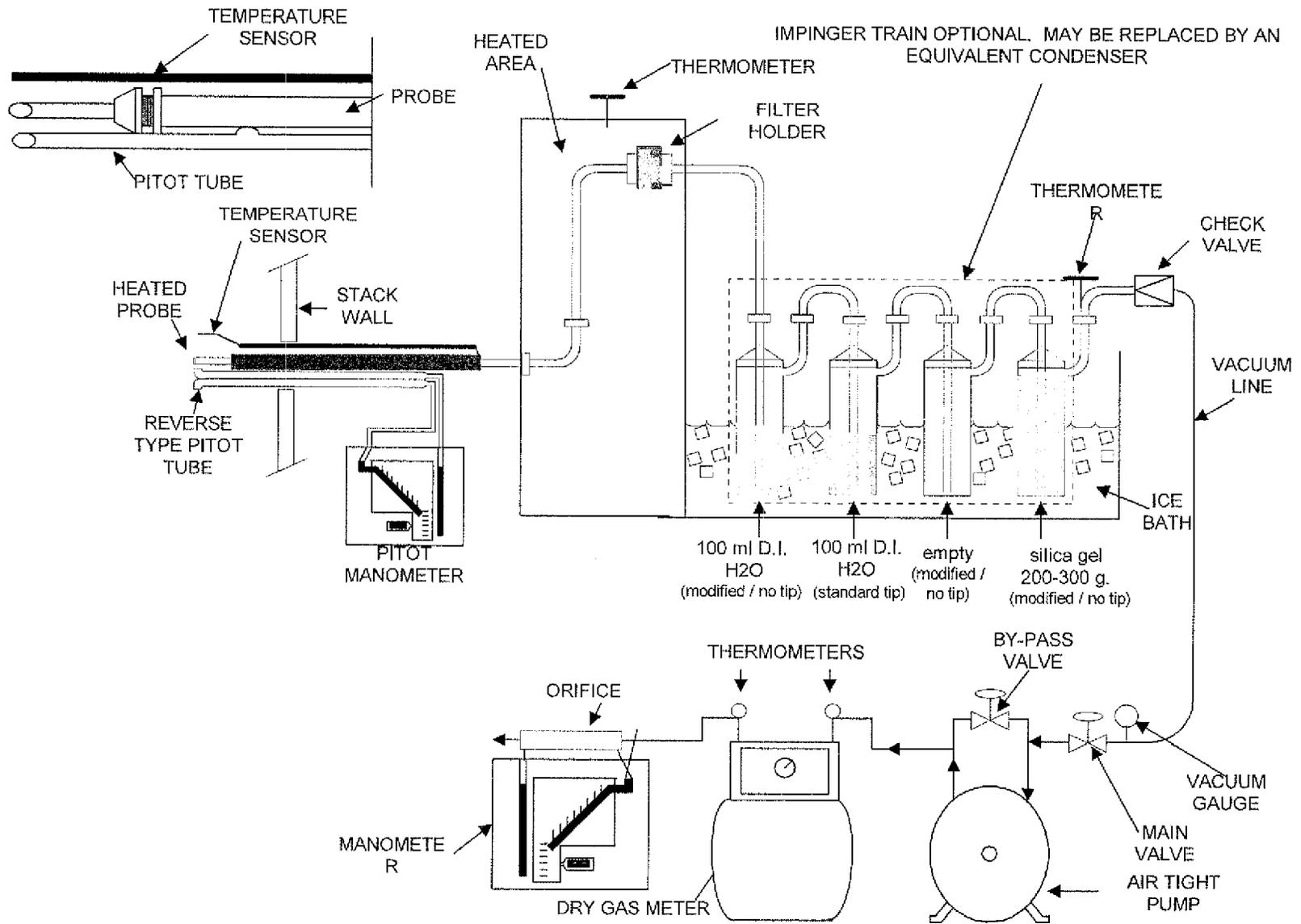
Point	% of Duct Depth	Distance From Inside Wall (in.) Port 1	Distance From Inside Wall (in.) Port 2
1	3.2	1.0	1.0
2	10.5	2.9	2.9
3	19.4	5.4	5.4
4	32.3	9.0	9.0
5	67.7	18.8	18.9
6	80.6	22.4	22.5
7	89.5	24.8	25.0
8	96.8	26.8	26.9

NOTES:
1. Not to scale
2. Dimensions subject to
change upon verification.

No.	Revisions	Date	By
0	For Approval	6/5/08	DM

Air Compliance Testing, Inc.
P.O. Box 41156
Cleveland, Ohio 44141
www.aircomp.com
Phone: (800) 372-2471 Fax: (216) 525-0901

3-Roll Steineman
Skinpak and Blister Card
Roll Coating Line (K003)
Exhaust Stack
Card Pak Inc.
Solon, Ohio



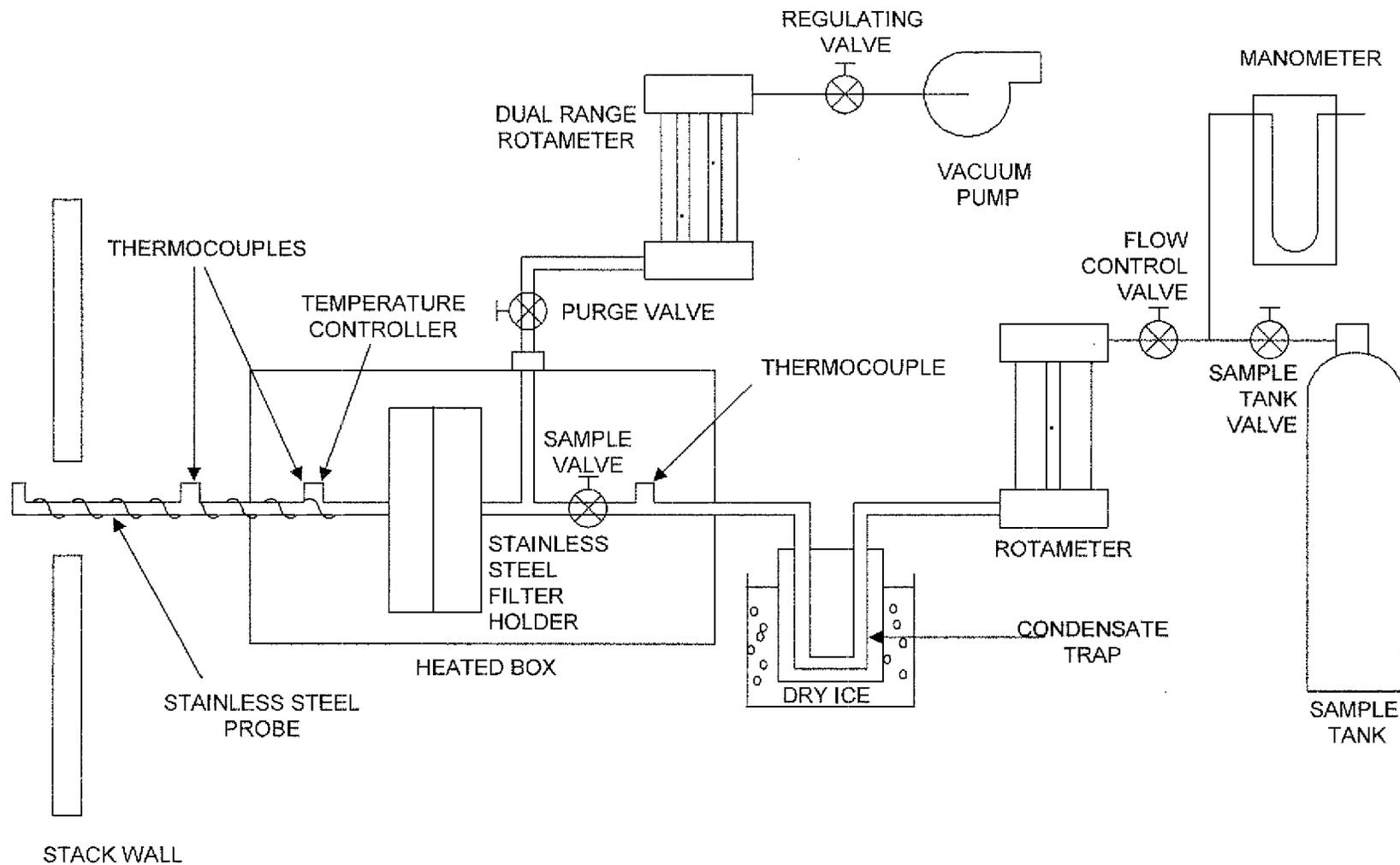
NOTES:
1. Not to scale

No.	Revisions	Date	By
0	For Approval	4/8/04	TH

Air Compliance Testing, Inc.
P.O. Box 41156
Cleveland, Ohio 44141
www.aircomp.com
Phone: (800) 372-2471 Fax: (216) 525-0901

U.S. EPA Method 4 Sample Train Schematic

Dwg. No.



NOTES:
1. Not to scale

No.	Revisions	Date	By
0	For Approval	1/14/84	TH

Air Compliance Testing, Inc.
P.O. Box 41156
Cleveland, Ohio 44141
www.aircomp.com
Phone: (800) 372-2471 Fax: (216) 525-0901

**EPA Method 25
Sample Train Schematic**

Dwg. No.



sustainable packaging solutions

June 3, 2008

Ms. Valerie Shaffer
Cleveland Division of Air Quality
1925 St. Clair Avenue NE
Cleveland, Ohio 44114-2080

RE: CardPak, Inc. Facility ID 13-18-53-8170

Dear Valerie,

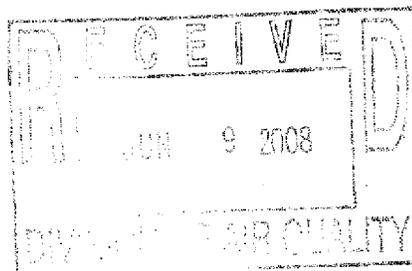
This letter serves as CardPak, Inc.'s (CardPak) written corrective action response to the Cleveland Division of Air Quality's (CDAQ) Notice of Violation – Failure to Conduct Timely Emissions Testing for K003. This violation was a result of an inspection conducted April 24, 2008 at CardPak's Solon, Ohio facility.

During the inspection on April 24, you had brought up a question regarding the Emissions Test for emission unit K003. As we stated during the inspection, CardPak did not conduct the Emissions Test prior to the expiration of its Title V Permit on January 8, 2008, because CardPak had the intention of no longer keeping its Title V Permit status. The significant monetary investment of an emissions test would be conducted if and when it was required to do so under its new State Permit to Operate. However, to respond to this question you had raised, CardPak received quotes and timelines from qualified stack testing firms immediately after your inspection. When CardPak officially received CDAQ's Notice of Violation, we were prepared to move forward with a corrective action plan: CardPak has scheduled a Compliance Emissions Test with Air Compliance Testing for July 10, 2008 for emissions unit K003. CDAQ will be receiving an ITT 30 days in advance of testing.

If you have any further questions on this corrective action response, please feel free to contact me or Keith Gaydosh at 330-854-9066 ext 21.

Sincerely,

Cc: Mr. Jeff Browsky, CardPak, Inc.
Mr. Keith Gaydosh, Affinity Consultants, Inc.



CardPak, Inc. • 29601 Solon Road • Solon, OH 44139

1.800.824.3342 • www.cardpak.com

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Shaffer, Valerie

From: Jeff Browsky [JBrowsky@CardPak.com]
Sent: Tuesday, June 03, 2008 5:00 PM
To: vshaffer@city.cleveland.oh.us
Subject: FW: Emailing: CPI-080603-01 CDAQ NOV Response Plan.doc

Attachments: CPI-080603-01 CDAQ NOV Response Plan.doc



CPI-080603-01
DAQ NOV Respons.

Valerie,

Enclosed is the corrective action letter you requested. If you have any further questions feel free to call me.

I will send out a certified copy to your attention on Wednesday.

Thank you,

Jeff Browsky

CardPak Inc.

June 3, 2008

Ms. Valerie Shaffer
Cleveland Division of Air Quality
1925 St. Clair Avenue NE
Cleveland, Ohio 44114-2080

RE: CardPak, Inc. Facility ID 13-18-53-8170

Dear Valerie,

This letter serves as CardPak, Inc.'s (CardPak) written corrective action response to the Cleveland Division of Air Quality's (CDAQ) Notice of Violation – Failure to Conduct Timely Emissions Testing for K003. This violation was a result of an inspection conducted April 24, 2008 at CardPak's Solon, Ohio facility.

During the inspection on April 24, you had brought up a question regarding the Emissions Test for emission unit K003. As we stated during the inspection, CardPak did not conduct the Emissions Test prior to the expiration of its Title V Permit on January 8, 2008, because CardPak had the intention of no longer keeping its Title V Permit status. The significant monetary investment of an emissions test would be conducted if and when it was required to do so under its new State Permit to Operate. However, to respond to this question you had raised, CardPak received quotes and timelines from qualified stack testing firms immediately after your inspection. When CardPak officially received CDAQ's Notice of Violation, we were prepared to move forward with a corrective action plan: CardPak has scheduled a Compliance Emissions Test with Air Compliance Testing for July 10, 2008 for emissions unit K003. CDAQ will be receiving an ITT 30 days in advance of testing.

If you have any further questions on this corrective action response, please feel free to contact me or Keith Gaydosh at 330-854-9066 ext 21.

Sincerely,

Cc: Mr. Jeff Brownsky, CardPak, Inc.
Mr. Keith Gaydosh, Affinity Consultants, Inc.

Shaffer, Valerie

From: Shaffer, Valerie
Sent: Tuesday, May 06, 2008 6:33 AM
To: 'keith.gaydosh@affinityconsultants.com'
Cc: 'Jeff Browsky'; Maline, Larry
Subject: RE: CardPak compliance inspection

Good Morning Keith and Jeff,

I apologize in the delay in getting back to you. Larry and I have both had discussions with the Permitting/Compliance and Enforcement supervisors, respectively. CDAQ holds that K003's emission testing requirement, per the applicable Title V permit, is still an effective requirement. Until the State PTOs are issued and effective, the Title V requirements are still applicable.

Please feel free to call me to discuss this. I will be attending a training course this week, but will be able to return any calls during scheduled breaks.

From the enforcement side, I will be sending out a violation letter documenting the inspection and the findings of the inspection in regards to K003. The letter will request a response and a corrective action plan within 14 days of receipt of the letter. From your below email, CardPak has already initiated steps to rectify the violation. Please respond formally to the violation letter with your continued corrective action plan.

Again, please call me with any questions.

Respectfully,

Valerie L Shaffer
Environmental Enforcement Specialist
Cleveland Division of Air Quality
Ohio EPA - Agency 13 (Cuyahoga)
phone: 216/ 664-6292
email: vshaffer@city.cleveland.oh.us

From: Keith Gaydosh [mailto:keith.gaydosh@affinityconsultants.com]
Sent: Thursday, April 24, 2008 11:00 AM
To: vshaffer@city.cleveland.oh.us; lmaline@city.cleveland.oh.us
Cc: 'Jeff Browsky'
Subject: CardPak compliance inspection

Valerie and Larry,
It was a pleasure meeting with you today at CardPak. I hope we provided you with all information needed – if you have any questions, please feel free to contact me. Also, we wanted you to know that CardPak has contacted a stack testing firm, and will be receiving a quotation for a compliance test. We will await your discussion with

5/6/2008

David Hearne to see where the status of the Title V / State PTO is at, and will be ready to move forward as soon as possible.

Please let myself or Jeff Browsky know if you have any further need. We look forward to working with your office on this matter.

Regards,

Keith Gaydosh
Project Manager
Affinity Consultants, Inc.
www.affinityconsultants.com
Phone: 330-854-9066 ext. 21
Fax: 330-854-9067
Email: keith.gaydosh@affinityconsultants.com

 Please consider the environment before printing this e-mail.

5/6/2008