



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 7003 1010 0004 2923 5137
RETURN RECEIPT REQUESTED**

6/8/11

James Swanson
Henkel Corporation
18731 Cranwood Parkway
Cleveland, OH 44128

**FACILITY ID: 13-18-59-7812
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Swanson:

On 12/27/10, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requesting that Henkel Corporation (Henkel), formerly Loctite Corporation, submit emissions calculations or provide the reason that qualifies an emissions unit (EU) for Exempt or DeMinimis Status and/or Permit-to-Install/Operate (PTIO) applications (for EUs that cannot be determined to be Exempt or DeMinimis) for all EUs indicated. Through an exchange of correspondence CDAQ agreed that some of the EUs did qualify for exemption based on the information provided. Loctite Corporation did in fact have an active permit to install (PTI) and permits to operate (PTOs) issued for five processes and related equipment at this facility that were now presumably under Henkel's control.

Subsequently, Henkel Corporation requested a meeting with CDAQ personnel. On 5/5/11 representatives from Henkel Corporation met with CDAQ personnel. It was established at that time that some of the EUs had been decommissioned (P006) or moved to another facility (P001) or incorporated into a process that had been determined to be de minimis (P003). Emissions Activity Category (EAC) forms were requested to be completed to address the remaining EUs (P002 & P005) along with completion of transfer of ownership notification paperwork reflecting effective dates of transfer and current contacts, including the Responsible Official designation. CDAQ is in receipt of a corrective action plan dated 5/20/11 that included the EAC forms, withdrawal dates and transfer of ownership notification.

The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ will process the EAC forms based on the information provided in the 4/19/96 PTO renewal application for EUs P002 and P005. Compliance personnel may be in contact with Henkel Corporation to verify the current data. 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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Henkel Corporation: 13-18-59-7812.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/dd

cc: Jonathan Blaine, Henkel Corporation
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318597812\2010-12-16 NEAR.docx



January 10, 2011

George Baker
Chief of Enforcement
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Ohio 44114-1839

JAN 12 2011

**Re: Henkel Corporation; Facility ID# 13-18-59-7812
Notice of Violation Dated December 27, 2010 ("NOV")
Request for Extension of Time to Respond**

Dear Mr. Baker:

Henkel Corporation ("Henkel") has received the above-referenced NOV from the Cleveland Division of Air Quality ("CDAQ") concerning alleged violation(s) of the State of Ohio's Permit to Install/Operate rules. The NOV pertains to operations at the Henkel facility located at 18731 Cranwood Parkway, Warrensville Heights, Ohio 44128 ("facility").

Henkel was very surprised to receive the NOV, particularly since it has been in constant operation at its present location for well over 30 years, a fact that is well known to CDAQ, Ohio EPA and USEPA, among other government agencies. Henkel is committed ensuring that all of its operations, including this facility, maintain continuous compliance with applicable law, including without limitation environmental health and safety requirements, and there has never been any indication that there may be compliance concerns under any potentially applicable air programs relative to facility operations.

Notwithstanding the above, Henkel desires to work with CDAQ and other interested agencies to resolve any concerns relative to the regulatory status of operations at the facility. In that regard, we intend to fully respond to all of the items identified in the NOV. However, in order to provide a thorough response, we request an additional 60 days. This extension will allow Henkel to gather and review all relevant records and compile whatever technical information that we may need to confirm the status of our operations at the facility.



Technologies
Operations & Research

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Phone 216.663-3010
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jim.swanson@us.henkel.com

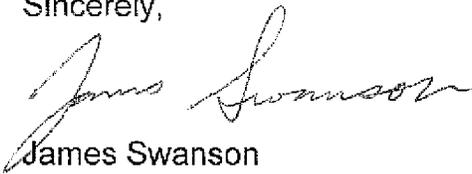
G. Baker
Cleveland Division of Air Quality

Page 2

We trust that CDAQ will agree that allowing additional time for Henkel to prepare a complete and accurate response to the NOV will provide both parties with the flexibility needed to resolve this matter as quickly as possible. We therefore ask that CDAQ approve a revised NOV response date of March 31, 2011.

Please call me at 216-663-3010 should you have any questions, and thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "James Swanson".

James Swanson
Director, Plant Operations

cc: Michael J. Krzywicki, CDAQ
John Paulian, OEPA
William MacDowell, USEPA, Reg. V
John P Preysner, Henkel of America