



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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 7002 2030 0001 1808 9432
RETURN RECEIPT REQUESTED**

12/27/10

James Swanson
Henkel Corporation
18731 Cranwood Parkway
Warrensville Heights, OH 44128

NON-HPV

FACILITY ID: 13-18-59-7812

NOTICE OF VIOLATION: Failure to apply for Permits to Install/Operate (PTIO)

Dear Mr. Swanson:

On 12/16/10, the Cleveland Division of Air Quality (CDAQ) inspected Henkel Corporation (Henkel) located at 18731 Cranwood Parkway in Warrensville Heights. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

In the course of a change of ownership (previously Loctite Corporation) this facility and associated emissions units (EUs) were indicated as shut down (instead of transferring ownership) on a Non Title V Fee Emission Report. The Ohio Environmental Protection Agency (Ohio EPA) database was changed to reflect the shutdown status as effective on 4/10/98. Henkel has been operating EUs without proper permitting or evaluation since this time. This is a violation of the Ohio Administrative Code (OAC) Rule 3745-31-02 and the Ohio Revised Code (ORC) 3704.03(F) and (G).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance.

It is necessary to provide emissions calculations to determine "Exempt Status" (OAC Rule 3745-31-03) or "DeMinimis Status" (OAC Rule 3745-15-05) and/or Permit-to-Install/Operate (PTIO) applications for current processes and equipment configurations.



CDAQ requests that Henkel submit emissions calculations or provide the reason that qualifies an 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 air emissions units that include the following (Note: Mixers that can be operated independently of each other should be treated as individual EUs):

- *Three (3) natural gas fired boilers (provide mmBtu/hr rating)
- *Naval Jelly production and packaging line
- *Anti-cease packaging line (Fill #50)
- *Clover mixing station (three mixers, one filling station)
- *Silicone mixing and extrusion (P009)
- *Six (6) tanks for polymer feedstock (four at 5500 gals, two at 4000 gals)
- *Dri-loc, pre-applied thread locker mixing station
- *Four (4) heat cure mixing stations
- *Twelve (12) mixers in the General Products mixing room
- *Five (5) Acrylated monomer feedstock tanks
(two at 9000 gals, one at 11,000 gals, two at 7500 gals)
- *Resinol mixing station
- *Six (6) mixing stations for acrylated monomers (UV/electron beam cure)
- *Five (5) 9000 gal feedstock tanks

Please submit the requested information to the following address:

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

Your written response to this letter must be received by CDAQ within thirty (30) 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.

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.



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.

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 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 for G.B.

George Baker
Chief of Enforcement

GB/dd

cc: Cheryl Hutson-Law, Henkel Corporation
Rich Palin, Henkel Corporation
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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- 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:

James Swanson
 Henkel Corporation
 18731 Cranwood Parkway
 Warrensville Heights, OH 44128

2. Article Number
 (Transfer from service label)

13-18-57-7910

A. Signature

William J. Brubaker III

- Agent
- Addressee

B. Received by (Printed Name)

William J. Brubaker III

C. Date of Delivery

1/13/04

D. Is delivery address different from item 1?
 If YES, enter delivery address below:

- Yes
- No

3. Service Type

- Certified Mail
- Registered Mail
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (Extra Fee)

- Yes

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• Sender: Please print your name, address, and ZIP+4 in this box •

Cleveland Department of Public Health
Division of Air Quality
75 Erieview Plaza, 2nd floor
Cleveland, OH 44114-1839

ATT: DAVE DECHANT