



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7011 3500 0000 1759 7426
RETURN RECEIPT REQUESTED**

8/9/12

Jack Grimaldi
Farrow Dry Cleaners, Inc.
3788 Lee Rd.
Cleveland, OH 44128

FACILITY ID: 13-18-00-6545

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

Dear Mr. Grimaldi:

On 2/9/12, the Cleveland Division of Air Quality (CDAQ) inspected Farrow Dry Cleaners (Farrow) located at 3788 Lee Rd. in Cleveland. On 2/27/12, CDAQ issued a Notice of Violation (NOV) advising you that you were operating sources in violation of specific applicable air statutes, air regulations, or air permit conditions. Due to a lack of response to the initial NOV, CDAQ issued a Second NOV on 4/12/12.

In both NOVs CDAQ requested that Farrow submit results for the required testing and a detailed narrative of how weekly leak checks and recordkeeping will be conducted going forward. Additionally, CDAQ requested that Farrow obtain City Permits for calendar years 2007 and 2008 by submitting the appropriate City Permit Fees.

On 4/20/12, CDAQ received the past due City Permit Fees for 2007 and 2008.

On 5/2/12, CDAQ received an email from Farrow indicating that contact had been established with the Ohio Environmental Protection Agency (Ohio EPA) Office of Compliance Assistance and Pollution Prevention (OCAPP). A meeting with their representative for 5/16/12 was confirmed.

On 5/16/12, Pam Korenewych from OCAPP met with Farrow. She contacted CDAQ to clarify some of the information requested in the NOVs, including the noted compliance due date of 5/25/12.

On 5/29/12, CDAQ received an email request from Farrow for a thirty (30) day extension on the compliance deadline due to delays in acquiring materials to conduct the required testing. CDAQ confirmed the necessity of the extension with OCAPP and granted the request.

On 6/15/12, CDAQ received a letter from Farrow that included a narrative description of how weekly leak checks were being conducted and documented. An intent to test notification (ITT) was also included indicating the proposed procedure and tentative test dates scheduled from 6/25/12 thru 7/9/12.



On 6/25/12, CDAQ personnel witnessed the initial solvent recovery rate testing.

On 8/3/12, CDAQ received copies of the Petroleum Dry Cleaners Performance Test Logs for both dryers #1 and #2. Acceptable recovery rates were established as required by the Initial Compliance Test in Title 40 of the Code of Federal Regulations, Part 60, Subpart JJJ (40 CFR Part 60 Subpart JJJ) and the Ohio Administrative Code (OAC) rule 3745-21-10(N).

The corrective action plan was received 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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Farrow Dry Cleaners: 13-18-00-6545.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dd *lk*

cc: Pam Korenewych, OCAPP
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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Intent to Test Notification

Facility Name: Farrow Dry Cleaners
Facility Premise No: 1318006545
SCC Number: 4-01-001-02

Proposed Test Dates/Time:

June 25, 2012 thru July 9, 2012

Facility Contact Information:

Jack Grimaldi
3788 Lee Road
Cleveland OH 44128
(216) 561-2355
jgrimaldi@farrowgroup.com

Farrow Dry Cleaners intends to perform the tests that are required by air permit #P0094591 issued on June 10, 2011.

Term f)(2) of Permit #P0094591 requires Farrow Dry Cleaners to perform an initial test per 60.624 of 40 CFR 60 Subpart JJJ.

§ 60.624 Test methods and procedures.

Each owner or operator of an affected facility subject to the provisions of §60.622(a) shall perform an initial test to verify that the flow rate of recovered solvent from the solvent recovery dryer at the termination of the recovery cycle is no greater than 0.05 liters per minute. This test shall be conducted for a duration of no less than 2 weeks during which no less than 50 percent of the dryer loads shall be monitored for their final recovered solvent flow rate. The suggested point for measuring the flow rate of recovered solvent is the outlet of the solvent-water separator. Near the end of the recovery cycle, the entire flow of recovered solvent should be diverted to a graduated cylinder. As the recovered solvent collects in the graduated cylinder, the elapsed time is monitored and recorded in periods of greater than or equal to 1 minute. At the same time, the volume of solvent in the graduated cylinder is monitored and recorded to determine the volume of recovered solvent that is collected during each time period. The recovered solvent flow rate is calculated by dividing the volume of solvent collected per period by the length of time elapsed during the period and converting the result with appropriate factors into units of liters per minute. The recovery cycle and the monitoring procedure should continue until the flow rate of solvent is less than or equal to 0.05 liter per minute. The type of articles cleaned and the total length of the cycle should then be recorded.

June 25 - July 9th

Measurement test

Dryer #1

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log



| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) (A) | Total volume collected during test, in milliliters (ml) (B) | (B) ml (A) min | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|--|--|--------------------|--|---------------------------|
| | | | | | | | |
| 6/25 | 11:33 | 11:43 | 10 min | 216 mL | 21.6 mL Per min | Med Heavy | 34 min |
| 6/25 | 1:58 | 2:08 | 10 min | 192 mL | 19.2 mL Per min | Med Heavy | 34 min |
| 6/25 | 3:01 | 3:11 | 10 min | 196 mL | 19.6 mL/min | Med Heavy | 34 min |
| 6/26 | 8:54 | 9:04 | 10 min | 240 mL | 24.0 mL/min | Heavy | 34 min |
| 6/26 | 10:01 | 10:11 | 10 min | 109 mL | 10.9 mL/min | Light | 34 min |

Measurement test
Dryer 1

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) | Total volume collected during test, in milliliters (ml) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-------------------------|---------------------------|---------------------------|---|---|--|--|---------------------------|
| | | | (A) | (B) | | | |
| 8/27 6/27 | 9:07 8:57 | 10:07 9:07 | 10 min 239 | 239 mL | 23.9 mL/min | Very Heavy | 34 min |
| 6/27 7/27 | 10:38 10:48 | 10:48 10:58 | 10 min | 250 mL | 25.0 mL/min | Very Heavy | 34 min |
| 6/28 | 8:15 | 8:25 | 10 min | 186 mL | 18.6 mL/min | med Heavy | 34 min |
| 6/28 | 10:30 | 10:40 | 10 min | 242 mL | 24.2 mL/min | Very Heavy | 34 min |
| 6/28 | 1:15 | 1:25 | 10 min | 156 mL | 15.6 mL/min | Light | 34 min |

Measurement test

Reyer 1

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) (A) | Total volume collected during test, in milliliters (ml) (B) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|--|--|--|--|---------------------------|
| 6/29 | 7:25 | 7:30 | 10 min | 192 mL | 19.2 mL/min | Heavy | 34 min |
| 6/29 | 9:00 | 9:10 | 10 min | 210 | 21.0 mL/min | Heavy | 34 min |
| 6/29 | 11:10 | 11:20 | 10 min | 138 | 13.8 mL/min | Light | 34 min |
| 6/30 | 7:40 | 7:50 | 10 min | 198 | 19.8 mL/min | Heavy | 34 min |
| 6/30 | 10:15 | 10:25 | 10 min | 165 | 16.5 mL/min | Medium | 34 min |

Measurement test

Oreyes 1

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) (A) | Total volume collected during test, in milliliters (ml) (B) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|--|--|--|--|---------------------------|
| 7/2 | 8:05 | 8:15 | 10 min | 172 mL | 17.2 mL/min | Medium | 34 min |
| 7/2 | 9:54 | 10:04 | 10 min | 138 mL | 13.8 mL/min | Light | 34 min |
| 7/2 | 12:23 | 12:33 | 10 min | 185 mL | 18.5 mL/min | Medium Heavy | 34 min |
| 7/3 | 6:58 | 7:08 | 10 min | 212 mL | 21.2 mL/min | Heavy | 34 min |
| 7/3 | 8:06 | 8:16 | 10 min | 170 | 17.0 mL/min | Medium | 34 min |

Measurement test
Dryer # 1

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) | Total volume collected during test, in milliliters (ml) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|---|---|--|--|---------------------------|
| | | | (A) | (B) | | | |
| 7/3 | 10:16 | 10:26 | 10min | 198 | 19.8 ml/min | Heavy | 34min |
| 7/3 | 12:15 | 12:25 | 10min | 238 | 23.8 ml/min | Very Heavy | 34min |
| 7/5 | 7:40 | 7:50 | 10min | 185 | 18.5 ml/min | Medium | 34min |
| 7/5 | 9:16 | 9:26 | 10min | 145 | 14.5 ml/min | Light | 34min |
| 7/5 | 11:31 | 11:41 | 10min | 230 | 23.0 ml/min | Very Heavy | 34min |

Measurement test

Dryer #2

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) (A) | Total volume collected during test, in milliliters (ml) (B) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|--|--|--|--|---------------------------|
| 6/25 | 10:59 | 11:09 | 10 min | 136 mL | 13.6 mL per min | Med Load | 34 min |
| 6/25 | 12:02 | 12:12 | 10 min | 86 mL | 8.6 mL per min | Med Load | 34 min |
| 6/25 | 2:06 | 2:16 | 10 min | 125 mL | 12.5 mL per min | Heavy | 34 min |
| 6/26 | 8:23 | 8:33 | 10 min | 238 | 23.8 | Very Heavy (jeans) | 34 min |
| 6/26 | 9:30 | 9:40 | 10 min | 98 mL | 9.8 | Very Light | 34 min |

Measurement test

Rye²

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) (A) | Total volume collected during test, in milliliters (ml) (B) | (B) ml (A) min | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|--|--|-------------------|--|---------------------------|
| | | | | | | | |
| 6/27 | 8:26 | 8:36 | 10 min | 215 mL | 21.5 mL/min | Heavy | 34 min |
| 6/27 | 9:30 | 9:40 | 10 min | 120 mL | 12.0 mL/min | very Light | 34 min |
| 6/28 | 7:45 | 7:55 | 10 min | 248 mL | 24.8 mL/min | very Heavy | 34 min |
| 6/28 | 9:43 | 9:53 | 10 min | 138 mL | 13.8 mL/min | Light | 34 min |
| 6/28 | 12:10 | 12:20 | 10 min | 220 mL | 22.0 mL/min | Heavy | 34 min |

Measurement test
 Dryer # 2

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) | Total volume collected during test, in milliliters (ml) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|---|---|--|--|---------------------------|
| | | | (A) | (B) | | | |
| 6/29 | 8:30 | 8:40 | 10min | 146 | 14.6 mL/min | Light | 34min |
| 6/29 | 9:58 | 10:08 | 10min | 230 | 23.0 mL/min | Very heavy | 34min |
| 6/29 | 12:30 | 12:40 | 10min | 206 | 20.6 mL/min | Heavy | 34min |
| 6/30 | 8:17 | 8:27 | 10min | 176 | 17.6 mL/min | Medium | 34min |
| 6/30 | 10:53 | 11:03 | 10min | 216 | 21.6 mL/min | Heavy | 34min |

Measurement test
Deyer 2

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) | Total volume collected during test, in milliliters (ml) | | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|---|---|--|--|---------------------------|
| | | | (A) | (B) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | | |
| 7/2 | 7:17 | 7:27 | 10 min | 202 mL | 20.2 mL/min | Heavy | 34 min |
| 7/2 | 9:20 | 9:30 | 10 min | 232 mL | 23.2 mL/min | Very Heavy | 34 min |
| 7/2 | 11:12 | 11:22 | 10 min | 157 mL | 15.7 mL/min | Medium | 34 min |
| 7/3 | 7:30 | 7:40 | 10 min | 227 mL | 22.7 mL/min | Very Heavy | 34 min |
| 7/3 | 9:30 | 9:40 | 10 min | 132 | 13.3 mL/min | Light | 34 min |

Measurement test
Dryer # 2

Farrow Dry Cleaners
Facility ID # 13 18 00 6545
Petroleum Dry Cleaners Performance Test Log

| Date and Load # | Start time of test | End time of test | Total time of test, in minutes (must be greater than 1 minute) | Total volume collected during test, in milliliters (ml) | | Load type (type of articles being cleaned) | Total length of the cycle |
|-----------------|--------------------|------------------|---|---|--|--|---------------------------|
| | | | (A) | (B) | $\frac{(B) \text{ ml}}{(A) \text{ min}}$ | | |
| 7/3 | 11:01 | 11:11 | 10min | 142 | 14.2 ml/min | Light | 34min |
| 7/5 | 7:07 | 7:17 | 10min | 210 | 21.0 ml/min | Heavy | 34min |
| 7/5 | 8:15 | 8:25 | 10min | 168 | 16.8 ml/min | Medium | 34min |
| 7/5 | 10:20 | 10:30 | 10min | 213 | 21.3 ml/min | Heavy | 34min |
| | | | | | | | |