



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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 7010 1870 0000 6591 4971
RETURN RECEIPT REQUESTED**

1/9/11

Brian Gill
Alcon Industries, Inc.
7990 Baker Ave.
Cleveland, OH 44102

HIGH PRIORITY VIOLATOR – GC-3 &7

FACILITY ID: 13-18-00-7755

NOTICE OF VIOLATION: Failure to comply with Permit to Install/Operate (PTIO) terms and conditions including recordkeeping, reporting and operational restrictions

Dear Mr. Gill:

On 12/6/11 and 12/12/11, the Cleveland Division of Air Quality (CDAQ) inspected Alcon Industries, Inc. (Alcon) located at 7990 Baker Ave. in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions as noted by individual emissions unit (EU) and designated as facility wide where appropriate.

Facility wide violations:

- Failure to submit 2010 Synthetic Minor Title V Fee Emissions Report and Emissions Inventory Summary (SMTV-FER and EIS). This is a violation of Ohio Revised Code (ORC) 3745.11 and Ohio Administrative Code (OAC) rule 3745-78-02.
- Failure to submit 2011 Annual Permit Evaluation Reports (PER). This is a violation of PTIOs #P0107363, #P0094807, #P0105730 and #13-04715. This is also a violation of ORC 3704.05(C) and OAC rule 3745-15-03(D).
- Open Burning witnessed by a CDAQ inspector on 12/12/11. The incident involved an approximately 4' x 4' x 4' composite wood container on a wooden pallet that had been ignited by molten metal splatter in the production area. Production personnel removed the container from the facility and allowed it to burn out of control until the CDAQ inspector required them to extinguish it. This is a violation of the City of Cleveland Codified Ordinances 277.08 and 277.09. Additionally, this is a violation of OAC Rule 3745-19-03(A).



EU Specific violations:

P002 – Gaylord SATB-30 (1994), Core making process located in the static foundry

P003 – Gaylord SATB-30 (1999), Core making process located in the static foundry

P015 – Gaylord SATB-30 (2005), Core making process located in the static foundry

Note: Daily, monthly and annual recordkeeping requirements for these three EUs are identical. Total emission rates are based on combined usage totals for all three EUs. PTIO #P0107363 applies to EUs P002 and P003. PTIO #13-04715 applies to EU P015. Violations noted below have existed since the issued effective dates of the respective permits (PTIO #P0107363 issued effective 3/2/11 and PTIO #13-04715 issued effective 9/17/10).

- ¹Daily recordkeeping insufficient to determine the Particulate Emission (PE) and Volatile Organic Compound (VOC) compliance. Failure to track combined VOC/Hazardous Air Pollutant (HAP) daily and annual emissions.
- ²Failure to provide annual usage rates for resin, hardener, sand and PE, VOC, OC, VOC/HAPs emissions tracked on a monthly basis and as a rolling 12-month summation.
- ³Annual Resin usage in excess of allowable (23,000 lbs/yr) based on a summation of quarterly usage totals provided by Alcon (46,000 lbs/yr)
- ⁴Failure to install, operate and maintain equipment to monitor pressure drop across the baghouse and record pressure drop on a daily basis.
- ⁵Failure to submit Quarterly Deviation reports

All of the deficiencies identified above are violations of ORC 3704.05(C) and violations of the following PTIO specific terms and conditions:

¹ PTIO #P0107363(1)(d)(2)(a-g) and PTIO #13-04715(1)(d)(2)(a-g)

² PTIO #P0107363(1)(c)(1, 2, 3) and (d)(1); PTIO #13-04715(1)(c)(1, 2, 3) and (d)(1)

³ PTIO #P0107363(1)(c)(1); PTIO #13-04715(1)(c)(1)

⁴ PTIO #P0107363(1)(d)(5); PTIO #13-04715(1)(d)(5)

⁵ PTIO #P0107363(1)(e)(1)(a-f); PTIO #13-04715(1)(e)(1)(a-f)



EU Specific violations (cont.):

P009 – Pouring and Cooling Operation located in the centrifugal foundry

- ¹ Failure to maintain daily records of the number of hours the EU was in operation. Annual operating hours had to be tabulated based on payroll records for primary EU operator.
- ²Daily visual emissions (VE) checks were conducted when the emissions unit was not in operation based on notations made in the VE log provided by Alcon.

The deficiencies identified above are violations of ORC 3704.05(C) and violations of the following PTIO specific terms and conditions:

- ¹ PTIO #P0094807(1)(d)(1)
- ² PTIO #P0094807(1)(d)(2)

P010 – Wheelabrator Blast Abrasion Operation and Cleaning in the centrifugal foundry

- ¹ Failure to maintain daily records of the number of hours the EU was in operation. Annual operating hours had to be tabulated based on payroll records for primary EU operator.

The deficiency identified above is a violation of ORC 3704.05(C) and a violation of the following PTIO specific term and condition:

- ¹ PTIO #P0094807(2)(d)(2)

P013 – Sand Storage Silo and Associated Dust Collector

- ¹ Failure to provide manufacturer's specifications for pressure drop range across the baghouse.

The deficiency identified above is a violation of ORC 3704.05(C) and a violation of the following PTIO specific term and condition:

- ¹ PTIO #P0105730(1)(d)(1)



EU Specific violations (cont.):

P016 – Palmer Mold Making Unit Located in the Static Foundry

- ¹Failure to provide monthly records of VOC emissions and rolling 12-month records of VOC emissions.
- ²Daily recordkeeping insufficient to determine the PE and VOC compliance. No EU specific usage rates for sand, resin, number of cores produced, cycles per day.
- ³Failure to record pound of resin used by this EU on a monthly basis for the purpose of determining the annual usage as a rolling 12-month summation
- ⁴Failure to install, operate and maintain equipment to monitor pressure drop across the baghouse and record pressure drop on a daily basis.
- ⁵ Failure to maintain daily records of the number of hours the EU was in operation. Annual operating hours had to be tabulated based on payroll records for primary EU operator.
- ⁶Failure to submit Quarterly Deviation reports

The deficiencies identified above are violations of ORC 3704.05(C) and violations of the following PTIO specific terms and conditions:

¹PTIO #13-04715(2)(d)(1)

²PTIO #13-04715(2)(d)(2)(a-f)

³PTIO #13-04715(2)(c)(1) and (d)(3)

⁴PTIO #13-04715(2)(d)(4) and (5)

⁵PTIO #13-04715(2)(d)(2)(d)

⁶PTIO #13-04715(2)(e)(1)

P017 – Cookie Dough Core Making Process with Grieves Natural Gas Oven Located in the Static Foundry

(Continued on next page to facilitate continuity and eliminate text break)



EU Specific violations (cont.):

P017 – Cookie Dough Core Making Process with Grieves Natural Gas Oven Located in the Static Foundry

- ¹Daily recordkeeping insufficient to determine the PE and VOC compliance. No EU specific daily usage rates for sand, number of cores produced, cycles per day, kerosene (lbs), core oil (lbs), hours of operation*, VOC emission rate from core oil and kerosene

*(Annual operating hours had to be tabulated based on payroll records for primary EU operator.)
- ²Failure to install, operate and maintain equipment to monitor pressure drop across the baghouse and record pressure drop on a daily basis.

The deficiencies identified above are violations of ORC 3704.05(C) and violations of the following PTIO specific terms and conditions:

¹PTIO #13-04715(3)(d)(1)(a-g)

²PTIO #13-04715(3)(d)(3)

P020 – Shakeout Associated with Separation of Product, Core, Sand from Molds and Recycling

- ¹Failure to maintain a rolling 12-month summation of operating hours (daily hours of operation were recorded)
- ²Failure to submit Quarterly Deviation reports

The deficiencies identified above are violations of ORC 3704.05(C) and violations of the following PTIO specific terms and conditions:

¹PTIO #13-04715(4)(d)(1)(b)

²PTIO #13-04715(4)(e)(4)



Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Alcon submit their 2010 SMTV- FER and EIS, the 2011 PERs and all Quarterly Deviation Reports for 2010-2011 electronically through the State of Ohio EPA's eBusiness Center and provide notification to CDAQ when these reports have been filed. Additionally, provide a detailed narrative addressing each EU specific violation noted above and the open burning incident. Include examples of the manner in which individual data tracking/acquisition will be conducted along with an explanation as to why baghouse requirements have been ignored and how compliance will be achieved. Submit your responses to the following enforcement representative:

Dave DeChant
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.

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 Alcon Industries, Inc.: 13-18-00-7755.

Sincerely,

Linda Kimmy
Field Enforcement Manager

LK/dd

cc: Gary Calhoun, Alcon
Scott K. McCready, ATC Associates, Inc.
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\1318007755\2011 Enforcement\2011-12-06
NOV.docx

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:

Brian Gill
 Alcon Industries, Inc.
 7990 Baker Ave.
 Cleveland, OH 44102

13-18-00-7750

2. Article Number (Copy from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

ROBERT W. HOBBS 01/12/12

C. Signature

ROBERT W. HOBBS

Agent
 Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

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

4. Restricted Delivery? (Extra Fee) Yes

7010 1870 0000 6591 4971



