



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 7011 3500 0000 1759 7891
RETURN RECEIPT REQUESTED**

9/12/12

David Hurder
Vice President
McGean Rohco, Inc.
2910 Harvard Ave.
Newburgh Heights, OH 44105

NON-HIGH PRIORITY FACILITY

FACILITY ID: 13-18-36-5229

**RESOLUTION OF VIOLATIONS
LETTER OF WARNING FOLLOW-UP LETTER**

Dear Mr. Hurder:

On 8/15/12, at approximately 7:30 pm the Cleveland Division of Air Quality (CDAQ) received a citizen's complaint regarding visible emissions (VE) observed being emitted from a smokestack at McGean Rohco located at 2910 Harvard Ave. in Newburgh Heights. The complainant forwarded a series of three photographs to substantiate their allegation and indicated the incident was occurring for at least thirty minutes that they personally witnessed.

On 8/16/12 and 8/17/12, CDAQ exchanged emails with Mr. Tom Edmunds, Environmental Health and Safety (EHS) Engineer at McGean Rohco. Mr. Edmunds was able to provide information regarding the incident and the specific emissions unit involved.

On 8/24/12, CDAQ issued a Letter-of -Warning (LOW) requiring McGean Rohco to submit additional information regarding the total duration of the emissions. And, also provide re-circulating scrubber liquor pH records as specified in PTI #13-04735, Part II(C) for the time frame corresponding to the VE.

CDAQ received a response letter to the LOW from McGean Rohco dated 9/4/12 that included the requested re-circulating scrubber liquor pH records. The letter also contained the assertion that the duration of the VE incident could not be confirmed because no McGean Rohco personnel witnessed the event. The letter further stated "that as precaution to prevent recurrence, we have counseled the operator involved and retrained all department operators on this procedure".



The requested records and response was received in a timely manner 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 McGean Rohco, Inc.: 13-18-36-5229.

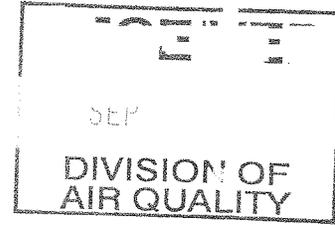
Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dd

cc: Tom Edmunds, McGean Rohco, Inc.
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
L:\Data\Facilities\1318365229\2012-5-15 ROV.docx

McGean
2910 Harvard Avenue
Cleveland, Ohio 44105-3010
216-441-4900
Fax 216-441-1377
www.mcgean.com



Sent Certified/Return Receipt Requested

September 4, 2012

Mr. Dave DeChant
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, OH 44114-1839

Dear Mr. DeChant,

This letter is in response to your Letter of Warning: Visible Emissions Complaint. As you requested, the records for the wet-scrubber pH and re-circulation flow rate are attached from August 15, 2012. According to our shift log, the emission control equipment was operating within the permit specifications at the time in question.

As the pictures show, the visible emissions, from the event on August 15, 2012 are darker than normal. However, McGean-Rohco, Inc. cannot confirm the duration or intensity of visible emissions, as no personnel observed the emissions. As previously stated, coincident to the time of the complaint, an excess of reactant was added to the reactor which may have resulted in a process upset that could cause an increase in visible emissions, but the duration and intensity of emissions cannot be determined by the information available. However as a precaution to prevent a recurrence, we have counseled the operator involved and retrained all department operators on this procedure.

Please let me or our EHS Engineer, Tom Edmunds, know if you need additional information.

Sincerely,

A handwritten signature in black ink that reads "David D. Hurder".

David D. Hurder
Vice President

/smg
Enclosure

cc: Tom Edmunds, EHS Engineer
McGean



Chrome Shift Change Log

date: 8-15

	starting	Check Equipment Safety Status Logbook	check MOC book	leaving
1st shift initials	UJ			300
2nd shift initials	2:30			1100
3rd shift initials	10:30pm			7:00

SCRUBBER STATUS

Shift	water level (b/w 2 yellow lines on sight glass tube)	SCRUBBER ON/OFF (if off, record time)	CHANGE WATER YES/NO	SCRUBBER FLOW RATE (> 20 gpm) *	SCRUBBER pH (7 - 12) *	initials
1st	✓	on	NO	44.3	9.0	UJ
2nd	✓	on	NO	44.3	7.3	OH
3rd	✓	on	NO	44.1	7.2	UJ

*if any parameter is out of range, correct the situation, then complete the logsheet with the corrections made.

CHECK SCRUBBER CAUSTIC TANK. REFILL WITH 25% CAUSTIC FROM TOTE IF LESS THAN 1/2 FULL.

TANKS STATUS

	CR1	CR2	CR3	Product Tank
1st shift	chrome sulfate	propionate complete	chrome nitrate	mal chrome
2nd shift	SULFATE SOL	PROPIONATE COMPLETE	CHROME NITRATE	MAL CHROME
3rd shift	CHROME SULFATE	DIRTY	CHROME NITRATE	MAL CHROME

Delta V alarm monitoring

Alarm tag	Failure	Action

NOTES:

1. CHANGE SCRUBBER WATER FOR EVERY BOIL OUT/RINSE OUT REACTOR
2. FILL OUT CHROME SUMP WASTE INVENTORY

last updated: 3/21/2009