

- 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:

EUCLID OH 44117

2. Article  
(Trans)

7010 0780 0001 1190 4445

A. Signature

*[Handwritten Signature]*

Agent

Addressee

B. Received by (Printed Name)

*[Handwritten Name]*

C. Date of Delivery

4-30-12

Is delivery address different from item 1?  Yes  
if YES, enter delivery address below:  No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

Yes



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview 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 0780 0001 1190 4445  
RETURN RECEIPT REQUESTED**

April 24, 2012

Kevin Elkins  
Facility Manager  
TECT Power  
P. O. Box 17187  
Euclid, OH 44117-0187

**FACILITY ID: 13-18-20-7467  
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Elkins:

On May 9, 2011, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV); a second NOV on August 11, 2011; a Receipt of Corrective Action Plan (RCAP) on September 12, 2011; a second RCAP on November 17, 2011; and a third NOV on January 2011, requiring TECT Power to submit a permit-to-install/operate (PTIO) application for a glass-impregnated coating line for metal parts and PTIO applications or potential to emit (PTE) calculations for seven other emissions units (EUs): P001, P004, P005, P006, P007, P011 and P015. CDAQ received the following corrective actions:

- On November 14, 2011, CDAQ received a material safety data sheet (MSDS) for the glass-impregnated coating line's coating in lieu a PTIO application. The MSDS provided enough information for CDAQ to determine that the EU has de minimis emissions.
- On April 13, 2012, CDAQ received information about EUs: P001, P004, P005, P006, P007, P011 and P015 which indicated they qualify for the de minimis exemption from PTIO applications. TECT Power pledged to maintain records of their actual emissions for EUs: P001, P004, P005, P006 and P007 so that each EU's actual emissions are less than 10 lbs./day. On behalf of TECT Power, EA Group sent PTE calculations which demonstrated emissions are less than 10 lbs./day.

Appropriate steps were taken to bring the sources 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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA facility identification number for TECT Power: 13-18-20-7467.

Sincerely,

A handwritten signature in black ink that reads "Valencia White".

Valencia White  
Chief of Enforcement, CDAQ

VW/dlw *LK*

cc: Tim Bowen, EA Group  
John Paulian, Ohio EPA Central Office  
William MacDowell, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318207467\2011-03-24 NEAR.docx



Environmental Analysis  
and Management

April 12, 2012

Mr. David Wagner  
**Cleveland Division of Air Quality**  
75 Erieview Plaza  
2nd Floor, Suite 200  
Cleveland, Ohio 44114-1839

RE: **TECT: 13-18-20-7467**  
**Potential to Emit Calculations (P011 and P015)**  
OH35916

Mr. Wagner:

EA Group conducted an emissions inventory for the two outstanding processes at TECT, 23555 Euclid Avenue, Cleveland, Ohio. These include P011, which is a parts grinding line, and P015, which is a series of forging presses. Work operations at TECT for these processes are conducted 24-hours per day, typically five days per week, for a total of 250 working days per year.

#### **P011: Parts Grinding Line**

The parts grinding lines consist of 15 grinders attached to two hydrostatic precipitators (Roto-clones) and associated capture systems, which are considered to be integral to the operation of the process in order to collect waste material so the grinders can continue to operate properly. In addition, these are integral to the operation of the grinding line for worker safety and health considerations, and the lines cannot be operated without the Roto-clone/capture system operating. As such, the Roto-clone and capture system is not considered to be an air pollution control device by definition. The capture system consists of suction lines below each grinding wheel. The grindings are collected and recycled by the Roto-clones. The Roto-clones consist of a wet scrub and cyclonic action and are followed by a filter and have a 99% control efficiency as derived from AP-42 B.2.3.

Based on estimations, each of the two Roto-clones collect a maximum of 800 pounds (lbs) of recycled material every five days. Assuming a collection efficiency of 99%, the fraction not collected which would be considered fugitive particulate emissions would be eight pounds every five days, per Roto-clone. This equates to 3.2 lbs of particulate emissions per day (3.2 lbs/day). Since this is less than 10 lbs/day, The P011 Parts Grinding Line would be considered to meet the de minimis air contaminant source exemption at OAC 3745-15-05.



April 12, 2012

Cleveland Division of Air Quality

RE: TECT: 13-18-20-7467

Potential to Emit Calculations (P011 and P015)

page 2

**P015: Forging Presses**

The forging presses have electric furnaces, and have little emissions potential. The parts made are solid metal and are stamped into shape. A graphite lubrication spray (Condaforge 317) is placed on the part before pressing. This material is water based with a graphite component. The water is vaporized in the press leaving only trace graphite. Since there is no capture of this, the total emissions would consist of particulate matter.

The annual graphite lubrication usage is 178 gallons, containing 35% solids (graphite 30% and sodium silicate 5%). This is then diluted with water to an 8% solution (225 gallons). Based on the Material Safety Data Sheet (MSDS) for the Condaforge 317 (attached), the density/mass of the material is 1222 kilograms per cubic meter ( $\text{kg/m}^3$ ), which is equivalent to approximately 9.25 pounds per gallon (lbs.gal). Based on the use of 178 gallons over a 250-working day year, the following calculation determines the potential fugitive emissions for particulate matter (PM), assuming all solids are released as PM, which would be an overestimation.

$$\text{Fugitive PM emissions} = \frac{(178 \text{ gallons/year}) (9.25 \text{ lbs/gallon}) (0.35)}{250 \text{ working days/year}} = 2.31 \text{ lbs/day.}$$

Since the potential to emit is less than 10 lbs/day, the P015 forging presses should be considered a de minimis air contaminant source per OAC 3745-15-05, and not require permitting.

If there are any questions regarding the above information, please contact the undersigned. Thank you for your time and consideration in this matter.

Sincerely,

Timothy S. Bowen  
Vice President/Technical Director

cc: Kevin Elkins, TECT  
file (OH35916)

Revision date : 25/06/2010  
Supersedes date : 19/04/2007

Version : 1.01  
Page : 1 / 4

CONDAFORGE 317

09056

**1. IDENTIFICATION OF THE SUBSTANCE/ PREPARATION AND OF THE COMPANY / UNDERTAKING**

PRODUCT CODE AND NAME  
RECOMMENDED USES AND RESTRICTIONS

09056 | CONDAFORGE 317

Company identification

Lubricant (see technical data sheet for more details).

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38670 CHASSE-SUR-RHONE  
FRANCE  
33 (0)4 78.07.38.38  
33 (0)4 78.07.38.00

Products Regulatory Affairs Department :  
E-mail : arp@condat.fr

Official advisory body

Emergency tel n° : 33 (0) 4 78 07 37 18 (Office hours)  
Emergency telephone number of ORFILA/ INRS : + 33 1.45.42.59.59.

**2. HAZARDS IDENTIFICATION**

Not concerned by CE mandatory labelling preparations

Adverse human health effects

Does not present any specific hazard if general hygiene rules are respected.

Information on ecological effects

See Section(s) 12

Physico-chemical hazards

Nothing to refer.

**3. COMPOSITION/ INFORMATION ON INGREDIENTS**CHEMICAL FAMILY

Aqueous dispersion of graphite.

Hazardous component(s)

% Weight

CAS Nr

EINECS/ELINCS

Graphite

20 - 30

7782-42-5

231-955-3

VLE

Sodium silicate 5 Na

1 - 5

1344-09-8

215-687-4

XI,R36/37/38

SEE SECTION 8 TOO FOR THE COMPONENTS WITH A EXPOSURE LIMIT VALUE.**4. FIRST-AID MEASURES**INHALATION

Take the victim out of polluted area and remove the victim to fresh air.  
Call a physician if needed.

SKIN CONTACT

Wash well with water.

EYE CONTACT

In case of eye contact, immediately rinse with clean water for 10-15 minutes. See an ophtalmologist if necessary.

INGESTION

If swallowed, do not induce vomiting. Rinse mouth with water. Call a physician if needed.

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Revision date : 25/06/2010  
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Version : 1.01  
Page : 2 / 4

CONDATFORGE 317		09056	
<b>5. FIRE - FIGHTING MEASURES</b>			
<u>EXTINGUISHING MEDIA</u>		Not specifically concernde (aqueous liquid).	
- Suitable		See Section(s) 10	
<u>SPECIFIC HAZARDS</u>			
<b>6. ACIDENTAL RELEASE MEASURES</b>			
<u>PERSONAL PRECAUTIONS</u>		Wear suitable protective clothing and gloves. See also chapter 8	
<u>ENVIRONMENTAL PRECAUTIONS</u>		Impound/recover large land spill. Prevent entry to sewers and public waters.	
<u>WASHING METHODS</u>			
Recovery		Suck up the liquid. If the recovery is impossible or if the spillage is too small, absorb with sand or other inert absorbent. cleaning with water.	
Decontamination/ cleaning		Give soiled materials to an approved recuperator. See also chapter 13	
Disposal			
<b>7. HANDLING AND STORAGE</b>			
<u>HANDLING</u>			
Technical protective measures		Local exhaust ventilation may be required to meet exposure standards in addition to general room ventilation.	
Precautions		Avoid contact with skin and eyes.	
Safe handling advice		See technical data sheet.	
<u>STORAGE</u>			
<u>Storage conditions</u>		Store sheltered from bad weather	
<u>Recommended storage temperatures (°C)</u>		5 - 40	
<u>Incompatible materials</u>		See Section(s) 10	
<u>PACKAGING MATERIALS :</u>			
Suitable			
<b>8. EXPOSURE CONTROLS / PERSONAL PROTECTION</b>			
<u>Exposure limits values</u>	<u>VME France</u>	<u>VLE France</u>	<u>MAK Germany</u>
	<u>mg/m3</u>	<u>mg/m3</u>	<u>mg/m3</u>
Graphite	2a	-	-
Sodium silicate 5 Na	-	-	-
<u>PERSONAL PROTECTION</u>			
Hands protection	gloves		
Eye protection	goggles/spectacles		
Other personal protections	Usual protection means : overalls, safety shoes		
<b>9. PHYSICAL AND CHEMICAL PROPERTIES</b>			
APPEARANCE			

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Version : 1.01  
Page : 3 / 4

CONDAFORGE 317		09056
Physical state at 20°C	Viscous liquid.	
COLOUR	black	
Odour	Odourless	
PH (STATE OF DELIVERY)	11	
Density, mass at 20°C (kg/m³)	1222	
FLASH POINT (°C)	non applicable	
SOLUBILITY		
Water	dispersible	
CHANGE IN PHYSICAL STATE AT 1013 hPa :		
- Freezing point (°C)	0 °C	
CANNOT STAND THE FROST ?	yes	
<b>10. STABILITY AND REACTIVITY</b>		
<u>STABILITY</u>	Stable in normal storage and use conditions.	
<u>HAZARDOUS REACTIONS</u>		
Conditions to avoid	No hazardous reaction is known in normal use conditions. See technical data sheet.	
Materials to avoid	Strong oxidizing agents	
Hazardous decomposition products	other than carbon monoxide , carbon dioxide :	
<b>11. TOXICOLOGICAL INFORMATION</b>		
<u>ACUTE TOXICITY</u>		
- Ingestion	Not classified harmful if swallowed.	
- Skin contact	Not classified as irritant	
- Eye contact	Not classified as irritant	
<u>SENSITIZATION</u>	Not classified sensitizing agent.	
<u>SUB-ACUTE &amp; CHRONIC TOXICITY</u>		
<u>SPECIFIC SIDE-EFFECTS</u>		
Carcinogenicity	Not classified	
Mutagenicity	Not classified	
Reproductive toxicity	Not classified	
<b>12. ECOLOGICAL INFORMATION</b>		
<u>PERSISTENCE AND DEGRADABILITY</u>		
Biodegradation :	No information available	
<u>ECOTOXICITY</u>		
<b>13. DISPOSAL CONSIDERATIONS</b>		
<u>DISPOSAL</u>		
Forbidding	Do not dispose of by means of sinks, drains or in the immediate environment.	
Disposal	Give to an approved recuperator for disposal.	
<u>DISPOSAL OF PACKAGING</u>	Completely empty packaging before disposal.	

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Version : 1.01  
Page : 4 / 4

CONDATFORGE 317	09056
<u>LEGISLATION</u>	Comply with applicable regulations.
Waste code :	12 01 99
<b>14. TRANSPORT INFORMATION</b>	
ROAD (ADR) / RAIL (RID)	
- Class number	Not classified
MARINE (IMO-IMDG)	
- Class	Not classified
AIRLINE (ICAO / IATA)	
- Class or division	Not classified
<b>15. REGULATORY INFORMATION</b>	
<u>EC REGULATION</u>	
symbol(s)	none
R Phrase(s) :	Not concerned by CE mandatory labelling preparations
<u>Tables N° of work diseases (France) :</u>	French Social Security Code Art. L461-1 to L 461-8, tables no.: 25
<u>Table N° of diseases in relation with work (France) :</u>	French Social Security Code Art. L461-6 + Art. D461-1, tables no.:
<b>16. OTHER INFORMATION</b>	
<u>ADVICE TO USERS</u>	
<p>This form completes technical data sheet but does not replace it. The information contained herein is based on the data available to us and believed to be correct. We do not warrant or guarantee their accuracy or reliability and we are not liable for any loss or damage arising out of the use thereof. The information and recommendations are offered for the users consideration and examination and it is the users responsibility to satisfy itself that they are suitable and complete for its particular use. The whole regulation is only mentioned to help the addresse, to perform it's duty when using a dangerous product. This list must not be considered as exhaustive and does not relieve the addresse to verify that some other obligations do not fall on him according to some other texts concerning the holding or handling of the product he is responsible for.</p>	
<p><u>List of R phrases mentioned in section 3 (phrases related to hazardous substances contained in the finished product) :</u> R36/37/38 - Irritating to eyes, respiratory system and skin.</p>	

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37400

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DESIGN 2

SIZE 2.5

SN N 780109

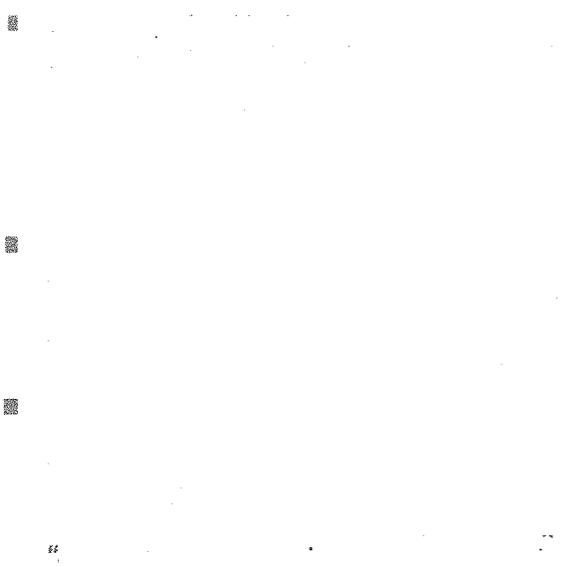
B E T T E R   A I R   I S   O U R   B U S I N E S S



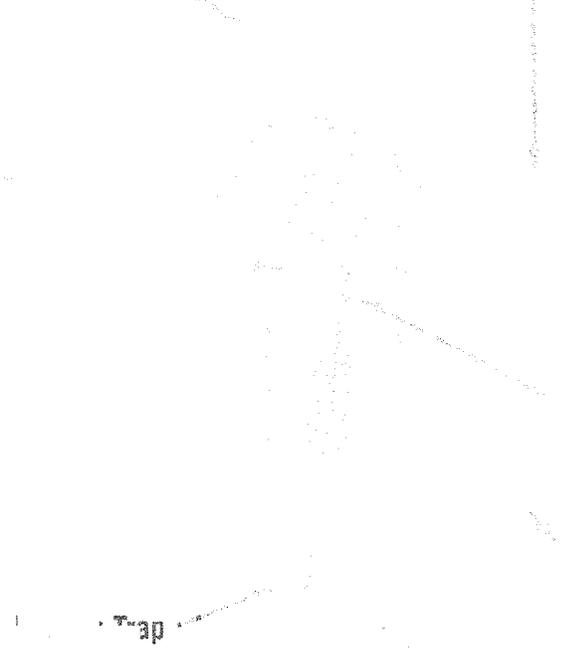


**Non-Newtonian Fluids**

Non-Newtonian fluids are those whose viscosity changes with the rate of shear or the time of shear. They do not follow Newton's law of viscosity.



**Non-Newtonian A**

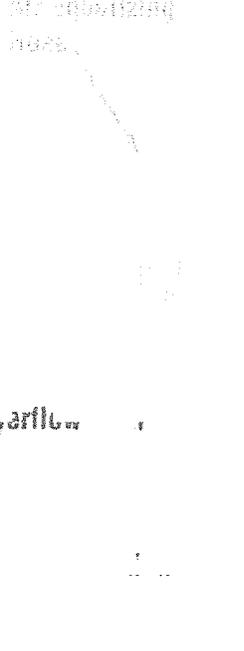


**Newtonian Fluids**

Newtonian fluids are those whose viscosity is constant and does not change with the rate of shear or the time of shear. They follow Newton's law of viscosity.



**Newtonian B**

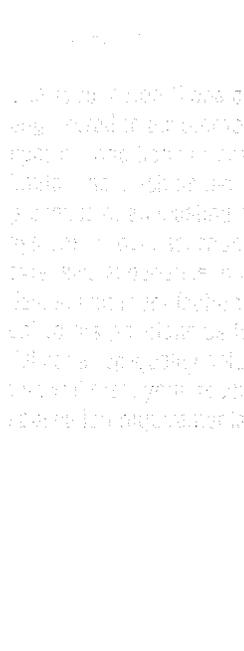


**Newtonian C**

Newtonian fluids are those whose viscosity is constant and does not change with the rate of shear or the time of shear. They follow Newton's law of viscosity.



**Newtonian D**



1. The first part of the report is a general introduction to the project, which was initiated in 1968. The purpose of the project was to study the effects of the new curriculum on the teaching and learning process in the primary school.



Diagram illustrating the structure of the report and the focus of the project.

2. The second part of the report is a detailed description of the new curriculum. This part is divided into two main sections: the first section describes the content of the curriculum, and the second section describes the methods of teaching and learning.



Diagram illustrating the structure of the curriculum.

3. The third part of the report is a detailed description of the teaching and learning process. This part is divided into two main sections: the first section describes the teaching process, and the second section describes the learning process.

4. The fourth part of the report is a detailed description of the effects of the new curriculum on the teaching and learning process. This part is divided into two main sections: the first section describes the effects on the teaching process, and the second section describes the effects on the learning process.

5. The fifth part of the report is a detailed description of the results of the project. This part is divided into two main sections: the first section describes the results of the teaching process, and the second section describes the results of the learning process.

6. The sixth part of the report is a detailed description of the conclusions of the project. This part is divided into two main sections: the first section describes the conclusions of the teaching process, and the second section describes the conclusions of the learning process.

7. The seventh part of the report is a detailed description of the recommendations of the project. This part is divided into two main sections: the first section describes the recommendations of the teaching process, and the second section describes the recommendations of the learning process.



Map of the study area showing the location of the study site relative to the city of St. Louis, Missouri.

### RESULTS

The results of the study are presented in this section. The first part of the results section describes the general characteristics of the study site. The second part of the results section describes the results of the various experiments conducted during the study. The third part of the results section describes the results of the various analyses conducted during the study.

### DISCUSSION

The results of the study are discussed in this section. The first part of the discussion section discusses the general characteristics of the study site. The second part of the discussion section discusses the results of the various experiments conducted during the study. The third part of the discussion section discusses the results of the various analyses conducted during the study.

Figure 1. Map of the study area showing the location of the study site relative to the city of St. Louis, Missouri.



Figure 1. Map of the study area showing the location of the study site relative to the city of St. Louis, Missouri.

The results of the study are presented in this section. The first part of the results section describes the general characteristics of the study site. The second part of the results section describes the results of the various experiments conducted during the study. The third part of the results section describes the results of the various analyses conducted during the study.

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Figure 1 shows the relationship between flow rate and water depth. The flow rate increases as the water depth increases, but at a decreasing rate. This indicates that the flow is becoming more turbulent as the water depth increases.

The results of the study are presented in this section. The first part of the results section describes the general characteristics of the study site. The second part of the results section describes the results of the various experiments conducted during the study. The third part of the results section describes the results of the various analyses conducted during the study.

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- **Power Plants**
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- **Al (Al, Mg, Ti)**
- **refining**
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