



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 7011 3500 0000 1759 7211
RETURN RECEIPT REQUESTED**

9/26/12

Gerald C. Ott
President
Aircraft Plating Corporation
1106 Clark Ave.
Cleveland, OH 44109-1824

NON-HPV

FACILITY ID: 13-18-00-4152

NOTICE OF VIOLATION: Failure to submit a Permit-to-Install/Operate (PTIO) application for a new Stainless Steel Passivation Tank

INFORMATION REQUEST: Emission Unit (EU) Status Verification Request

Dear Mr. Ott:

On 9/11/12, Cleveland Division of Air Quality (CDAQ) personnel met with you and conducted an inspection of Aircraft Plating Corporation (APC) located at 1106 Clark Ave. in Cleveland. During our initial conference it was established that the CDAQ and State of Ohio Environmental Protection Agency's (Ohio EPA's) databases indicated seven emissions units (EUs) associated with your operations. Four of the EUs are described as electroplating lines, one EU as a buffing operation and two EUs as gas fired boilers. All of the EUs have been designated as "Registration Status" since 12/87.

You stated that EU B002: Natural Gas Fired 1.26 mmBtu/hr Boiler had been removed from the facility, EU P002: Buffing Operation had been converted to an internal dust collection system and the remaining electroplating lines, EU P001: Nickel Plating Tanks, EU P003: Cleaning, Brass and Copper Plating Operation, EU P004: Cleaning Bath, Silver Strike, Silver Plating and EU P005: Electrolysis Bath for Stainless Steel are still in operation, as is EU B001: Natural Gas Fired 3.5 mmBtu/hr Sellers Boiler. Additionally, you indicated that a passivation tank using citric acid for stainless steel had been installed.



This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Failure to submit a PTIO application prior to the installation of the Stainless Steel Passivation Tank is a violation of the Ohio Revised Code (ORC) Section 3704.03 and the Ohio Administrative Code (OAC) rule 3745-31-02.

Unless you undertake some type of corrective action with respect to the above noted violation, you will remain in non-compliance. CDAQ requests that APC submit a PTIO application for the Stainless Steel Passivation Tank to the following address:

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

Additionally, we discussed that due to the length of time since your processes were last evaluated and subsequent changes in the environmental laws have occurred, it was now necessary to re-assess the permitting status of your active EUs.

A copy of OAC Rule 3745-31-08(D) was provided to you noting the applicability of the citation that "The director may at any time require the owner or operator of an air contaminant source which obtained registration status prior to the effective date of this rule, to submit an updated application for a PTIO or variance and/or to demonstrate its continued compliance with paragraph (B) of this rule."

In an effort to bring your operation into current compliance status, CDAQ requests that APC provide a written request for the withdrawal of EU B002, including the appropriate effective date (dismantled/removed date). Also, provide information/calculations for EUs P001, P003, P004 and P005 that establishes continued compliance with the requirements for registration status, and/or submit PTIO applications for the respective EUs to the address noted above.

No action is required for EU B001 as it qualifies for a permanent exemption under OAC Rule 3745-31-03(A)(1)(a) because it is natural gas-fired and rated at less than 10 mmBtu/hr. EU P002 qualifies for a permanent exemption under OAC Rule 3745-31-03(A)(1)(y) because the cyclone has been removed and the operation now vents internally.

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, or to compile the requested information, your response must include a timeline for providing the information/calculations or PTIO applications and sent to the following enforcement representative:

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



At the time of CDAQ's site visit you were provided with PTIO applications and Emissions Activity Category (EAC) forms. PTIO applications may also be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in ORC Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars (\$25,000) or imprisonment for not more than one year, or both, for each violation.

Additionally, at the time of CDAQ's site visit you were made aware that free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

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 Aircraft Plating Corporation: 13-18-00-4152.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/ddUK

cc: Adrienne LaFavre, OCAPP
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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