

**AKRON REGIONAL
AIR QUALITY MANAGEMENT DISTRICT**

Division of the Akron
Cuyahoga, Mahoning, Portage and Summit Counties

TELEPHONE: (330) 375-2480
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L. M. Malcolm, P.E.
Administrator

9/28/2012

Certified Mail

Brian Leon
Cornwell Quality Tools Co.
200 North Cleveland Avenue
Mogadore, OH 44260

Re: NOTICE OF VIOLATION - 40 CFR Part 63, Subpart N, and Operation of Air Contaminant Source without a Permit. Facility ID #1677150010

Dear Brian Leon:

The Akron Regional Air Quality Management District (ARAQMD) has learned that the facility identified above has failed to comply with the Ohio Administrative Code (OAC), and the Code of Federal Regulations (CFR) Title 40, Part 63, Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

Violation #1:

Cornwell Quality Tools Co. has been operating a decorative chrome plating line prior to applying for and obtaining an air Permit-to-Install and Operate (PTIO) from the Ohio Environmental Protection Agency (Ohio EPA). The operation of any stationary air pollution source without first applying for and obtaining a PTIO constitutes a violation of OAC rule 3745-31-02(A)(1)(c) which states that *no person shall cause, permit, or allow the operation of any air contaminant source... without first obtaining authority to operate through issuance of a PTIO from the director.*

Requested Action:

PTIO Application #A0045724 for the decorative chrome plating line (P001) was received on 9/24/12. No further action is required at this time.

Violation #2:

Cornwell Quality Tools Co. has been operating a decorative chrome plating line since January 1956. The facility has not met the following requirements of 40 CFR Part 63, Subpart N:

§63.343(c)(5)(ii)	Monitoring to demonstrate compliance
§63.346(b)	Recordkeeping requirements
§63.347(c)	Initial notification (July 24, 1995)
§63.347(e)	Notification of compliance status (February 24, 1996)
§63.347(h)	Ongoing compliance status reports for area sources

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Requested Action:

Conwell Quality Tools Co. shall submit the documentation identified above to the ARAQMD within 30 days of receipt of this letter in order to demonstrate compliance with the applicable requirements of 40 CFR Part 63, Subpart N.

Please note this determination does not preclude Ohio EPA's authority from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions concerning this letter, please contact me at 330-812-3954 or email: kkanoza@sched.org.

Sincerely,



Kelly Kanoza
Akron Regional Air Quality Management District

cc: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA