



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 2011 0002 6936 3198
RETURN RECEIPT REQUESTED**

October 1, 2012

Yung Son
Owner
Best Dry Cleaner – Bedford Heights
25618 Aurora Road
Bedford Hts., Ohio 44146

NON-HPV

FACILITY ID: 13-18-04-8645

NOTICE OF VIOLATION: Failure to conduct weekly visual inspections of dry cleaning equipment; failure to conduct monthly inspections for perceptible leaks using a halogenated hydrocarbon detector or perchloroethylene gas analyzer.

Dear Mr. Son:

On September 18, 2012, the Cleveland Division of Air Quality (CDAQ) inspected Best Dry Cleaner – Bedford Heights (Best Dry Cleaner) located at 25618 Aurora Road in Bedford Heights. This letter serves as notification that you are operating an air emissions source in violation of the following applicable air statutes, air regulations, or air permit conditions.

Your operation of emissions unit (EU) D001: Firbimatic perchloroethylene dry cleaning machine, is in violation of permit-to-install (PTI) No. 13-04733, in that the following records were not available for review during CDAQ's inspection:

- Weekly visual inspections of dry cleaning components (Part III. A. III. 1.);
- Weekly temperature measurements of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser (Part III. A. III. 2.); and,
- The following records that shall be kept on site for a period of not less than five (5) years (Part III. A. III. 3.):
 - a. Receipts of all perchloroethylene purchases.
 - b. The volume of perchloroethylene purchased each month as recorded from perchloroethylene purchases.
 - c. The calculation and result of the yearly perchloroethylene consumption (12-month rolling summation) to be determined on the first day of each month.



- d. The results of all visual inspections, including the dates when EU D001 components are inspected for leaks and the name or location of dry cleaning system components where leaks were detected.
- e. The dates of repair and records of written or verbal orders for repair parts.
- f. The results and dates of all equipment monitoring required by PTI No. 13-04733.
- g. Control equipment maintenance, and
- h. The amount of fabric dry cleaned with perchloroethylene, from January 1 to December 31 of each year, in pounds.

Please note that a violation of your PTI No. 13-04733 is also a violation of Ohio Revised Code section 3704.05(C).

Additionally, your operation of EU D001 is also in violation of Title 40 Code of Federal Regulations (CFR) § 63 Subpart M: National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities, in that as of July 28, 2008, EU D001 should have been inspected monthly for perceptible leaks while operating using a halogenated hydrocarbon detector or perchloroethylene gas analyzer.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Best Dry Cleaner submit a corrective action plan detailing how weekly visual inspections and temperature measurements of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser will be conducted. Additionally, the corrective action plan shall address how the recordkeeping requirements as required by PTI No. 13-04733 and Title 40 CFR § 63 Subpart M will be maintained in the future. Your corrective action plan shall be submitted to the following enforcement representative:

Valerie Shaffer
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 fourteen (14) 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 (\$25,000) or imprisonment for not more than one year, or both, for each violation.



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 Valerie Shaffer at (216) 664-6292. All correspondence with CDAQ must include the Ohio EPA facility identification number for Best Dry Cleaner: 13-18-04-8645.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/vls

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
L:\Data\Facilities\1318048645\2012-09-18 NOV.docx