

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 6122  
RETURN RECEIPT REQUESTED**

November 9, 2012

Jay Amin  
Owner  
Cleveland Circuit Corp. dba Instrumatics  
15516 Industrial Parkway  
Cleveland, OH 44135

NON-HPV

**FACILITY ID: 13-18-00-7750**

**NOTICE OF VIOLATION: Failure to install continuous monitoring system to read pressure drop across wet scrubber; failure to record daily records of pH, flow rate, hours of operation, operating times and pressure drop of the scrubber; and failure to submit deviation reports**

Dear Mr. Amin:

On October 29, 2012, the Cleveland Division of Air Quality (CDAQ) inspected Cleveland Circuit Corp. dba Instrumatics (Instrumatics) located at 15516 Industrial Parkway in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Instrumatics has failed to install, operate and maintain a continuous monitoring system for the static pressure drop across the scrubber and the scrubber flow rate while operating emissions unit (EU) P003: Electronic circuit board etching and fusing line. Instrumatics is also required to record daily the following operating parameters of the common packed tower (KCH Hedron III wet scrubber):

- pressure drop across the scrubber, in inches of water
- scrubber water flow rate, in gallons per minute
- operating times for the capture (control) system, control device, monitoring equipment, and associated emissions units
- the hours of operation of EU P003



The failure to record and maintain the records listed above is a violation of the terms and conditions in the permit-to-operate (PTO) for EU P003: Electronic circuit board etching and fusing line and Ohio Administrative Code (OAC) Rule 3745-31-05(A)(3).

During the inspection on October 29, 2012, CDAQ viewed four electroless plating lines utilizing Copper, Gold, Nickel and Tin. These unassigned emissions units have been determined to be *de minimis*, per OAC Rule 3745-15-05(B), but are subject to federal regulations. CDAQ has enclosed an informational pamphlet regarding plating and polishing operations.

Additionally, CDAQ has enclosed copies of the permit-to-install (PTI) #13-2572 and PTOs for EUs P002: Ovens for drying and curing electronic circuit boards and P003: Electronic circuit board etching and fusing line.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Instrumatics install and maintain the necessary monitoring system for the KCH Hedron III wet scrubber, demonstrate that daily records are being kept and submit two weeks of daily monitoring to the following enforcement representative within thirty (30) days of receipt of this letter:

Megan Murphy  
Cleveland Division of Air Quality  
75 Erieview Plaza 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

If there is insufficient time to correct the alleged violations within this timeframe, a written response which includes a timeline for correcting the alleged violations must be received within thirty (30) days of receipt of this letter.

As a reminder, permit-to-install/operate (PTIO) applications for EUs P002: 3 drying ovens for curing electronic circuit boards and EU P003: Electronic circuit board etching and fusing line are to be submitted prior to the expiration of current PTOs for each unit. The PTOs for both units expire February 28, 2013.

Permit-to-install/operate (PTIO) applications may 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 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 Megan Murphy at 216-664-4258. All correspondence with CDAQ must include the Ohio EPA facility identification number for Instrumatics: 13-18-00-7750.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/mm

cc: Jeffrey Pallotta, Quality Control Manager - Instrumatics  
George P. Baker, CDAQ  
Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Brian Dickens, U.S. EPA Region V  
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encl: Copies of PTI and PTOs for EUs P002 and P003  
Summary pamphlet of Regulations Controlling Air Emissions from Plating and Polishing Operations, US EPA