



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erievue 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 7181  
RETURN RECEIPT REQUESTED**

12/10/12

Mr. Joseph Blanton  
Plant Manager  
Cereal Food Processors, Inc.  
1635 Merwin St.  
Cleveland, OH 44113

**HIGH PRIORITY FACILITY**

**FACILITY ID: 13-18-00-0229**

**NOTICE OF VIOLATION: Failure to maintain Permit to Install/Operate (PTIO) specified pressure drop range across baghouses serving emissions units (EUs) F003, F004 and F005; Failure to report pressure drop deviations on Quarterly Deviation Reports; Failure to conduct permit required pressure drop deviation investigations and maintain records of findings/actions; Failure to resubmit Third Quarter Deviation Report after a revision was requested**

Dear Mr. Blanton:

On 11/27/12 and 11/28/12, the Cleveland Division of Air Quality (CDAQ) inspected Cereal Food Processors, Inc. (CFP) located at 1635 Merwin St. 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.

CFP failed to maintain PTIO specified pressure drop range across baghouses serving emissions units (EUs) F003: Grain milling system, controlled by baghouse, Grinders, separators, sifting conveyors, "Mill Building", F004: Flour handling and loading, controlled by baghouse, Bins, Sifters, Impact Mills, "Flour Warehouse" and F005: Feed product loading, controlled by baghouse, Bins, pneumatic conveying. Records provided by CFP for the first forty-four (44) weeks of 2012 indicate the following deviations:

Three baghouses associated with EU F003

Kice M-288-8, General Mill Filter (32,000 acfm), two (2) occasions

Kice M-144-10, Cleaning House Filter (20,000 acfm), three (3) occasions

Kice S-36-10, Hammer Mill Filter (4,500 acfm), thirty-four (34) occasions



Four baghouses associated with EU F004

Kice HRB-12-416, Storage Bin #2 (1,500 acfm), forty-three (43) occasions

Kice HRB-12-416, Storage Bin #3 (1,500 acfm), forty (40) occasions

Kice HRB-12-416, Storage Bin #4 (1,500 acfm), forty-two (42) occasions

Kice HRB-12-416, Storage Bin #5 (1,500 acfm), forty-two (42) occasions

Two baghouses associated with EU F005

Kice R-14-6, Feed Storage Bin (1,500 acfm), forty-one (41) occasions

Kice HRB-12-416, Feed Scale Bin (1,500 acfm), twenty-one (21) occasions

These are violations of PTIO modification #P0109223 Part C, (1)(d)(1), and the Ohio Revised Code (ORC) Section 3704.05(C).

And, CFP failed to conduct permit required pressure drop deviation investigations and maintain records of findings/actions. This is a violation of PTIO modification #P0109223 Part C, (1)(d)(2) and ORC Section 3704.05(C).

Additionally, CFP failed to report any of the pressure drop deviations on their Quarterly Deviation Reports and to resubmit the Third Quarter Deviation Report after it had been returned with a revision requested. These are violations of PTIO modification #P0109223 Part C, (1)(e)(3), and ORC Section 3704.05(C).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that CFP submit a corrective action plan outlining steps to be taken to bring the above noted baghouses into compliance with the specified pressure drop ranges in PTIO modification #P0109223 Part C, (1)(d)(1). And, provide a sample of a recordkeeping form for obtaining all investigation and corrective action related information for pressure drop deviations as specified in PTIO modification #P0109223 Part C, (1)(d)(2) to the following enforcement representative:

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

Also, electronically resubmit the Quarterly Deviation Reports for 2012 through Ohio EPA Air Services noting the pressure drop deviations in the format prescribed in PTIO modification #P0109223 Part C, (1)(e)(3).

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.



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 Cereal Food Processors, Inc.: 13-18-00-0229.

Sincerely,

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

Valencia White  
Chief of Enforcement, CDAQ

VW/ddw

cc: 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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