

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 #70122210000052090144
RETURN RECEIPT REQUESTED**

December 18, 2012

Kelly Munhollon
Angstrom Graphics Midwest, Incorporated
4437 East 49th Street
Cuyahoga Heights, OH 44125

FACILITY ID: 13-18-17-0170

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Munhollon:

On November 26, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requiring Angstrom Graphics Midwest, Incorporated (Angstrom) to submit a new plan of corrective action outlining:

- the steps that will be taken to prevent the operation of emission units K004 and K008 without the use of the thermal oxidizer, (evaluation of the emission units and the control device),
- what steps that will be taken should an excursion occur in the future and
- what reporting requirements will be executed should an excursion occur in the future, to CDAQ within fourteen (14) days of receipt of the NOV.

CDAQ also requested Angstrom submit revised quarterly deviation reports for the first quarter of 2012 via eBusiness Center Air Services which reflect the fact that EUs K004 and K008 were operated without the use of the thermal oxidizer.

On December 12, 2012, Angstrom submitted corrected semi-annual and quarterly deviation reports for the first quarter and half of 2012.

On December 14, 2012, CDAQ received a corrective action plan in the form of a Maintenance Work Instruction Plan which addressed:

- the steps that will be taken to prevent the operation of emission units K004 and K008 without the use of the thermal oxidizer, (evaluation of the



emission units and the control device),

- what steps that will be taken should an excursion occur in the future and
- what reporting requirements will be executed should an excursion occur in the future.

The corrective action was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and 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 Andrew Kenney at 216-420-7683. All correspondence with CDAQ must include the Ohio EPA facility identification number for Angstrom Graphics Midwest, Incorporated: 13-18-17-0170.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/ak

cc: John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
L:\Data\Facilities\1318170170\2012-10-23 ROV+NEAR.doc

Carrier: Guaranteed Delivery Service
From: Angstrom Graphics Inc Midwest
 4437 East 49th Street
 Cuyahoga Hts OH 44125 USA

Date: 12/14/2012
 Angstrom Graphics Inc Midwest

Bill of Lading

J201212140015

Prepaid

Ship To:
 Cleveland Division of Air Quality
 75 Erieview Plaza 2nd Floor
 Cleveland OH 44114

Delivery Instructions:

Contact: Andrew Kenney

ARTICLE DESCRIPTION, SPECIAL MARKS AND EXCEPTIONS

NO. OF SKIDS	Job #	Job Description	Weight	TTL WEIGHT
0	1529538-12	Misc. Shipping - FY 12-13 - De		0 #
		Ttl Skids:	0	
Version:	Letter/reports	Ttl Cartons:	1	
		Qty Per Carton:	1	
		Ttl Copies:	1	

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If any problems occur in transit, call 1-800-634-1262, ext. 1722

Freight Class 55 ITEM # 161700

* If the shipment moves between two ports by carrier by water the law requires that the bill of lading shall state whether it is "carrier's shipper's weight"

The property described above, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to destination, if on its route or otherwise to deliver to another carrier on the route to said destination. It is, mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Bill of Lading set forth in the National Motors Freight Classification 100-x and successive issues. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee - For purpose of notification only.)

If this shipment is to be delivered to the consignee without recourse on the consigner, the consigner shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consigner)

Shipper: _____
 Signature Date
Customer: _____
 Signature Date

Carrier: _____
 Signature Date

Angstrom Graphics Midwest, Inc.
13-18-17-0170

Angstrom Graphics
4437 East 49th Street
Cleveland, OH 44125

December 14, 2012

Andrew,

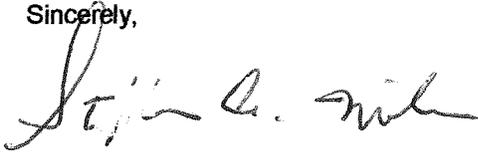
In regard to the violation letter received November 30th, we emailed revised work instructions pertaining to preventing the presses from running without the RTO and also reporting in the event that becomes necessary due to a severe malfunction.

Additionally we sent signed deviation reports with the corrections that you asked for concerning the two days in April. Our owner Wayne Angstrom signed the revised reports and noted that we were not running without the afterburner those days. We still contend that this was a recording issue and not a malfunction of the system. If the afterburner shuts down for any reason, it immediately shuts both web presses down and they can not be restarted by our personnel until the after the RTO is fixed and functioning correctly. While we know that it is possible to bypass the system in an emergency, we do not have anyone employed by us that has the expertise to do that. Our maintenance work orders and press logs do not show any shutdown time due to the afterburner.

That being said, we have taken steps to ensure that our record keeping is accurate, monitored and meets requirement. We have trained the employees responsible for this important procedure.

You can contact me at any time if there are any questions or if there is anything else required of us.

Sincerely,



Stephen A. Milam
Director of Operations
Angstrom Graphics Midwest

Maintenance Work Instructions

Reviewed By:

Approved By: Steve Milam

Date: 12-4-2012

Subject: Regenerative Thermal Oxidizer

General

The RTO must be in operation at all times when a web press is running. In the event of equipment malfunction the decision to run without the RTO in operation can only be made by the owner of the company. Any employee violating this procedure will be separated from employment.

Preventive Maintenance

Angstrom Graphics maintenance department will perform monthly visual checks consisting of the following:

- Visually inspect all pneumatic lines and components.
- Visually inspect all blowers
- Grease fan bearings if needed.
- Check and tighten any loose belts. Replace as needed.

The vendor for RTO maintenance will be scheduled in annually to perform the manufacturers recommended maintenance.

Off-Line Inspection

- Inspect the exterior of the RTO and record and abnormalities
- Inspect the inside of the combustion chamber and poppet assembly.
- Verify poppet disc timing.
- Visual inspect all pneumatic lines and components.
- Visually inspect the insulation and stuff cracks and seams where needed.
- Static test pressure switches.
- Leak check blocking valves per NFPA.
- Change all thermocouples.
- Change uv scanner and spark igniter.
- Change battery in PLC and chart recorder.
- Visually inspect all blowers
- Grease fan bearings if needed.
- Visually inspect all dampers and verify operation.
- Clean out the AC drive heat sink.
- Check calibration of duct suction transmitter.

On-Line Inspection

- Check safeties
- Verify burner firing rate.
- Check NGI gas flow rate.
- Restart RTO and record pressures and temperatures.
- Verify operation of RTO

RTO Malfunction

If the RTO malfunctions it automatically shuts the presses down and they will be unable to restart until the RTO is repaired.

In the event of an RTO malfunction that would cause significant downtime, loss of production and financial strain on the business it may be necessary to run without the afterburner. That decision may only be made by the owner of the company and requires assistance from the manufacturer.

- If the RTO has an issue and needs repair the maintenance staff must trouble shoot the problem and determine an estimated repair time.
- Maintenance will notify the Pressroom Manager of the time required for repair or recommend that the manufacturers service technician is called in.
- The Pressroom Manager or Director of Operations will inform the owner of the problem. Progress on the repair will be monitored and compared to delivery requirements.
- If the workload dictates that we must run without the afterburner the owner will inform the Director of Operations.
- The RTO vendor will be called to assist with the bypass procedure.
- The Director of Operations will log the start and stop time of presses running without the afterburner in the “**Afterburner Log**” located in the pressroom office.
- **The Director of Operations or Pressroom Manager will notify the local EPA representative of the issue at onset with planned repair information and again when back on-line.**
- The Director of Operations or Pressroom Manager will also notify our facility EPA representative so that the “Quarterly Deviation Report” can be updated with the information.

Maintenance Department Data Recording

- The maintenance employee on duty at weekly start-up must change the chart for the RTO.
- Date and initial the chart neatly and legibly.
- If you are starting on third shift please use the date of the shift end not the shift start.
- **Very Important Note:** Make sure that the chart is pinned correctly and the recorder starts at the right time. The first pin should be in the center of the large hole leaving one pin about ¼” away. **Visually check that the chart starts at the correct time.** Typically about 11PM Sunday night. If the charts not pinned correctly the entire chart is wrong and makes it difficult to prove our RTO uptime with the EPA.
- Turn the used chart in to the web office.

Director of Operations

- Compare the chart to the run data to ensure that they match. Investigate any discrepancies to ensure accuracy and turn in to the Manufacturing Clerk to print run reports and scan to PDF.
- Save the PDF on the computer and file the paper charts in the filing cabinet.
- Note any RTO downtime where presses were running.

Manufacturing Clerk

- Pick up the RTO chart each week
- Print out a Web Run report from Hagen for the week.
- Scan the RTO chart and run report to PDF and send to the Director of Operations and the Facility EPA representative.
- Attach the report to the chart and turn them in to the Web Office.
- If there is any RTO downtime, print the operators time cards for that time period which will show the exact stop and start times of presses in operation.

July 30, 2012
Revised 12/5/12

Facility ID: 1318170170
Angstrom Graphics Midwest, Inc.
4437 East 49th Street
Cleveland, OH 44125

Quarterly Deviation Report for April, May and June 2012

Emission Unit:

Sheetfed Press:

K005 - No Deviations	Quarterly VOC: Did not run.
K009 - No Deviations	Quarterly VOC: 1,200.79 lbs.
K010 - No Deviations	Quarterly VOC: 1,761.62 lbs.

Web Presses:

K004 - Press ran without using the AWS RTO on April 27th and 28th.
K008 - Press ran without using the AWS RTO on April 27th and 28th.

Control equipment for K004 and K008 - AWS RTO run hours - 1,416 hrs.

Submitted by:

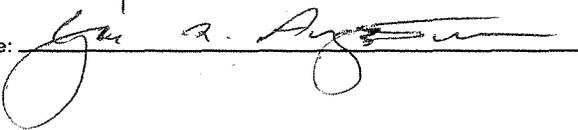

Kelly Munhollon
Shipping Supervisor

Not possible to run
with the RTO down.

Jan 12. Angstrom
12/2/12

Quarterly Deviation Rpt. 55959
Angstrom Graphics Midwest, Inc.
1318170170
December 05, 2012

a) I am a Responsible Official as defined in OAC Rule 3745-77-01(II) and specified in OAC rule 3745-77-03(D); and
b) Based on information and belief formed after reasonable inquiry, I hereby affirm that all factual statements in this transmittal are true, accurate and complete to the best of my knowledge and that all judgments and estimates have been made in good faith.

Responsible Official Name (please print): Wayne R. Angstrom Title: Chairman, C.E.O.
Responsible Official Signature:  Date: 12/12/12

July 30, 2012
Revised 12-5-12

Ohio EPA

Facility ID: 1318170170
Angstrom Graphics Midwest
4437 East 49th Street
Cleveland, OH 44125

Semi- Annual Deviation Report for January, February, March, April, May, and June 2012

Emission Unit:

Sheetfed Press:

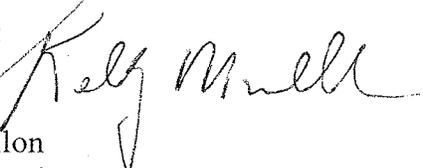
K005 - No Deviations	VOC: 0 - Did not run
K009 - No Deviations	VOC: 2,949.99 lbs.
K010 - No Deviations	VOC: 3,463.18 lbs.

Web Presses:

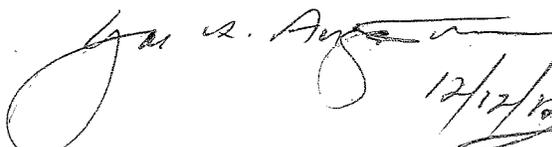
K004 - Press ran without using the AWS RTO on April 27th and 28th.
K008 - Press ran without using the AWS RTO on April 27th and 28th.

Control equipment for K004 and K008 - AWS RTO run hours -3,048 hrs.

Submitted by:

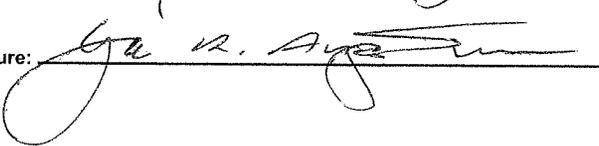

Kelly Munhollon
Shipping Supervisor

Not possible to run presses
with the R.T.O. down.


12/12/12

Semi-Annual Deviation rpt. 55960
Angstrom Graphics Midwest, Inc.
1318170170
December 05, 2012

a) I am a Responsible Official as defined in OAC Rule 3745-77-01(II) and specified in OAC rule 3745-77-03(D); and
b) Based on information and belief formed after reasonable inquiry, I hereby affirm that all factual statements in this transmittal are true, accurate and complete to the best of my knowledge and that all judgments and estimates have been made in good faith.

Responsible Official Name (please print): Walter R. Angstrom Title: Chairman, C.F.C.
Responsible Official Signature:  Date: 12/12/12