



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 6184
RETURN RECEIPT REQUESTED**

December 31, 2012

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

FACILITY ID: 13-18-00-7750

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

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. CDAQ determined that Instrumatics 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 was 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).



On November 9, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation Letter requiring Cleveland Circuit Corp. dba Instrumatics (Instrumatics) to 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 within thirty (30) days of receipt of the letter.

CDAQ is in receipt of a corrective action plan dated December 18, 2012. Instrumatics installed the monitoring system and submitted daily record keeping requirements for a two week period.

As discussed on December 28, 2012, with Mr. Pallota of Instrumatics, the KCH Hedron III wet scrubber must be operated in compliance with the parameters specified in the PTO for EU P003: Electronic circuit board etching and fusing line. Any values reported outside of the specified parameters for pH and pressure drop are considered a deviation and violation of PTO operating terms and conditions for EU P003.

The corrective action plan was received in a timely manner 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 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,

Grinda Kimmmy for VW

Valencia White
Chief of Enforcement, CDAQ

VW/mm

cc: Jeffrey Pallotta, Instrumatics
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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