



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 7012 2210 0000 5209 4593  
RETURN RECEIPT REQUESTED**

1/31/13

Jeremy Halford  
President  
Mayfran International, Inc.  
6650 Beta Dr.  
Mayfield, OH 44143

**FACILITY ID: 13-18-32-7843**

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

Dear Mr. Halford:

On 3/21/12, the Cleveland Division of Air Quality (CDAQ) inspected Mayfran International, Inc. (Mayfran) located at 6650 Beta Dr. in Mayfield.

On 4/12/12, CDAQ issued a Notice of Violation (NOV) requesting that Mayfran submit Material Usage/Volatile Organic Compound (VOC) records for emissions unit (EU) K003: Machine Tool "Pyramid" Spray Booth with Natural Gas (NG) Drying Oven and EU K004: East Spray Booth per terms of Permit-to-Install (PTI) Modification #13-03089 (K003) and PTI Modification #13-03104 (K004) for the period 1/1/11 thru 12/31/11. And, provide a corrective action plan indicating how Mayfran will maintain recordkeeping and reporting requirements per terms of the respective PTI modifications for EUs K003 and K004. Additionally, CDAQ requested Mayfran to commence submission of Quarterly Deviation Reports for EUs K003 and K004 beginning with the Second Quarter of 2012, due 7/31/12 covering the period 4/1/12 thru 6/30/12.

On 5/30/12, CDAQ issued a Receipt of Corrective Action Plan (RCAP) letter confirming receipt of Mayfran's NOV response letter dated 5/8/12 that included a narrative description addressing development of an Excel worksheet for Material Usage/ VOC tracking; records for 1/1/11 thru 12/31/11; assurance that the Second Quarter Deviation reports will be submitted before 7/31/12; mentioned use of a non-permit compliant coating and reference to clean-up material and thinner usage.

In the 5/30/12 RCAP letter, CDAQ cited outstanding recordkeeping deficiencies, but also gave consideration of the recent issuance of Permit-to-Install/Operate (PTIO) #P0095570. The requirement to submit a Second Quarter Deviation report was waived. However, Mayfran was requested to comply with providing 2011 cleanup material records as specified under the requirements of both PTI modifications #13-03089 (K003) and #13-03104 (K004) which were still effective through 2011.



CDAQ also requested that Mayfran submit a one month sample of current recordkeeping per the Monitoring and Recordkeeping Requirements established in PTIO # P0095570, Part (C)(1)(d)(1)(a-g) and Part (C)(1)(d)(2)(a-d) by 7/6/12.

On 7/5/12, CDAQ received a verbal request for a two week extension of the 7/6/12 deadline which was followed up with a written request submitted via email.

On 7/9/12, CDAQ issued a RCAP letter granting the request for a new compliance deadline of 7/20/12.

On 7/19/12, CDAQ received an electronic version of Mayfran's response (hard copy received 7/24/12) that included an Excel spreadsheet with current recordkeeping.

On 7/25/12, CDAQ contacted Mayfran to relate that deficiencies existed in the current recordkeeping. Also, the requested 2011 cleanup material records were not provided. CDAQ requested that Mayfran representatives schedule a meeting at CDAQ's offices to review Monitoring and Recordkeeping Requirements established in PTIO # P0095570, Part (C)(1)(d)(1)(a-g) and Part (C)(1)(d)(2)(a-d) and to address the 2011 cleanup material records.

On 8/16/12, CDAQ personnel met with Mayfran representatives at Mayfran's offices to facilitate access to their database and demonstration of new tracking software being integrated into their system.

It was determined during the review of the original spreadsheet provided in Mayfran's 7/24/12 response that the appropriate formula for determining the VOC content daily volume weighted average was incorrect. Additionally, Mayfran was erroneously indicating the allowable as 3.75 lbs/gal instead of the permit cited average of 3.5 lbs/gal.

The original spreadsheet was dismissed and new tracking software is being implemented. Corrections to the formula were provided to allow for the exclusion of water and exempt solvents. And, it was determined that values from the Material Safety Data Sheets (MSDS) for the coatings had been entered into the wrong columns of the new software and would need to be reversed. Also, it was established that the Xylene being added to one of the coatings (KEM 400) as a thinner was being accounted for twice in addition to the amount used as a clean-up material.

Specific to the 2011 clean-up material tracking it was determined that the Xylene use should also subtract out the amount disposed of as hazardous waste to accurately account for the actual VOC emissions. And, for the Ethylene Glycol, application of a VOC emissions factor of 50% of Ethylene Glycol used would be appropriate to reflect the waste disposal. The same approach will be acceptable for recordkeeping going forward under the new permit as it was based on 100% evaporation of the clean-up materials.

On 8/24/12, CDAQ issued a RCAP letter summarizing the 8/16/12 meeting with Mayfran personnel. CDAQ requested that Mayfran provide sample calculations demonstrating that the formulas embedded in the new software spreadsheet are accurately accounting for the VOC daily volume weighted average and the pounds of VOC per gallon "as applied" for all coatings, including the hardener for Hydralon B and the Xylene used as a thinner with KEM 400.



On 9/21/12, CDAQ received an email response from Mayfran that included a general cover letter confirming implementation of new software to track coating usage, records from August 2012 for coating and clean-up material usage, re-calculation of the 6/6/12 VOC daily weighted average and VOC daily weighted averages for August 2012. Additionally, the cover letter included a discussion of the 2011 purchase and disposal history for clean-up material.

On 9/28/12, CDAQ received an email response from Mayfran providing the embedded calculations used in the new VOC tracking software.

On 10/10/12, CDAQ issued a RCAP letter indicating acceptance of the basic detail of the daily coating and clean-up material tracking, the emission factors calculated for clean-up material usage and the discussion regarding the inaccuracy of using purchase and disposal records for tracking 2011 clean-up material usage.

However, it was noted that upon closer review it was determined that the calculation used for the daily volume-weighted average VOC content (excluding water and exempt solvents) did not conform to the equation from the Ohio Administrative Code (OAC) rule 3745-21-10(B)(9) cited in PTIO # P0095570, Part(C)(1)(f)(1)(d).

Mayfran was requested to contact CDAQ upon receipt of the RCAP letter to facilitate incorporation of the correct formula for calculating daily volume-weighted average VOC content (excluding water and exempt solvents) into the recordkeeping. Submit corrected daily volume-weighted average VOC content (excluding water and exempt solvents) records for 6/6/12 and all of August 2012. And submit the 2011 clean-up material usage based on the agreed upon estimation method established in the 9/21/12 response.

A 10/26/12 compliance deadline was established for providing the requested information.

Pursuant to the 10/10/12 RCAP letter, CDAQ personnel worked with Mayfran's consultant to devise a worksheet that would calculate the compliant coatings.

On 10/26/12, CDAQ received electronic responses from Mayfran and their consultant that included an acceptable estimation of the 2011 clean-up material usage, noted concerns over potential miscalculations in the worksheet devised in collaboration with CDAQ and an assertion that there had been an error in the original data/worksheet supplied with the 9/21/12 response. A recalculation of the formula for the 6/6/12 data was supplied showing compliance.

Staffing/personnel changes at CDAQ delayed detailed review of the information supplied by Mayfran and their consultant.

On 11/14/12, CDAQ contacted Mayfran and related concerns that additional information was still required to determine if coating density was being factored into the calculations. Mayfran indicated that the density was being included, and on 11/16/12 agreed to supply copies of Environmental Data Sheets (EDS) for all of their coatings. During the period covering 11/19/12 through 11/29/12 all of the required EDSs were provided electronically for review by CDAQ.



Due to the volume of information, holidays, health issues and workload a thorough review by CDAQ was not completed until late January of 2013. Upon request, Mayfran supplied all of their material usage tracking for December of 2012 for comparison with CDAQ's calculations.

It has been determined that Mayfran is successfully tracking all required information to determine compliance with their permit conditions. Only two changes are required:

1. Since the daily volume-weighted average is per EU, the east and west booths should not be subtotaled and added together. Each one should stand on its own.
2. To complete the calculation, the spreadsheet column labeled "Emission VOCLX (lbs)" should be divided by the column labeled "Quantity Used (gal)" to reflect the actual daily volume-weighted average in lb/gal VOC emissions per EU. This does not need to be programmed into the spreadsheet. A log maintaining the daily division performed manually will suffice.

The corrective action plan 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 Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Mayfran International, Inc.: 13-18-32-7843.

Sincerely,

Valencia White  
Chief of Enforcement, CDAQ

VW/dd

cc: Jayne Siegfried, Mayfran International, Inc.  
Lyle George, Mayfran International, Inc.  
Ken Radtke, Jr., Auburn Environmental  
John Paulian, Ohio EPA Central Office  
Brian Dickens, U.S. EPA Region V  
L:\Data\Facilities\1318327843\2012-3-21 ROV+NEAR.docx