



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 3046
RETURN RECEIPT REQUESTED**

February 19, 2013

Gerald J. Schill
The Chemical Solvents, Inc.
3751 Jennings Road
Cleveland, OH 44109

**HIGH PRIORITY FACILITY
HIGH PRIORITY VIOLATOR: GENERAL CRITERION 7 AND 9**

FACILITY ID: 13-18-00-7651

NOTICE OF VIOLATION: Failure to demonstrate control efficiency of modified vapor recovery system for J002; Inadequate hourly and monthly reporting required for P002 and P013; Inadequate rolling 12 month summations for P002 and P0013

Dear Mr. Schill:

On January 24, 2013, the Cleveland Division of Air Quality (CDAQ) inspected The Chemical Solvents, Inc. (Chemical Solvents) located at 1010 Old Denison Avenue in Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, and/or air permit conditions.

On January 28, 2013, Chemical Solvents electronically submitted (via the eBusiness Center) a deviation report for the 4th quarter of 2012 stating that the vapor recovery unit for emissions unit (EU) J002: Jennings Loading Rack with Vapor Recovery System, will be replaced during the 1st quarter of 2013. The Vapor Recovery Unit was modified without demonstrating that the vapor recovery system meets or exceeds 90 percent control efficiency as required in the permit-to-install/operate (PTIO) issued to Chemical Solvents on August 16, 2011. This is a violation of PTIO #P0094783 Part C.1.2.d.

Also, the record keeping requirements for EU P002: LUWA II, Thin Film Evaporation Unit (steam) for Spent Solvents, including double condensers with chilled water, is required to be kept in pounds and tons. Records provided to CDAQ on January 18, 2013, via e-mail were reported in gallons processed. This is a violation of PTIO #P0094783 Part C.3.d.1., which specifically lists the following parameters to be recorded:

- The total amount of all materials processed (in pounds and tons per month),
- The rolling 12-month summation of all materials processed (in pounds and tons),



- The average hourly amount of material processed (in tons per hour),
- The average monthly organic compounds (OC) emissions rate (in pounds per hour), and
- The rolling 12-month summation of OC emissions (in pounds and tons).

In addition, Chemical Solvents has failed to report the following parameters for EU P013: High Solids Blending Unit as specified in PTIO #P0094783 Part C.4.d.1:

- The monthly average of OC emissions per pound of raw material processed,
- The average OC emissions in pounds per day calculated,
- The rolling, 12-month summation for all raw materials processed,
- The rolling 12-month summation for all OC emissions in tons.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Chemical Solvents submit the following records within thirty (30) days of receipt of this letter:

- Demonstrate the modified vapor recovery system for EU J002: Jennings Loading Rack complies with the required 90% control efficiency with the modified refrigeration unit installed in January 2013;
- The amount of material processed for EU P002: LUWA II in tons per hour as a monthly average for February 2012 through January 2013;
- The amount of material processed for EU P002: LUWA II in tons per day as a monthly average for February 2012 through January 2013;
- The amount of material processed for EU P002: LUWA II as a rolling 12-month summation for February 2012 through January 2013;
- The total number of days in operation for EU P002: LUWA II each month for February 2012 through January 2013;
- The rolling, 12-month summation for all raw materials processed in EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013;
- The rolling, 12-month summation of OC emissions in tons for EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013;
- The monthly average of OC per pound of raw material processed for EU P013: EU P013: High Solids Solvent Blending Unit for February 2012 through January 2013; and
- The average OC emission calculations in pounds per day for EU P013: High Solids Solvent Blending Unit as specified in PTIO #P0094783 Part C.4.d.1.



All information requested should be submitted to the following enforcement representative:

Megan Murphy
Cleveland Division of Air Quality
75 Erieview Plaza 2nd 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.

CDAQ additionally requests the following information within thirty (30) days of receipt of this letter:

- The total daily throughputs for EUs J001: Denison loading rack and EU J002: Jennings loading rack for June, September, and October of 2012;
- The operation logs of the vapor recovery units for EUs J001: Denison Loading Rack and EU J002: Jennings Loading Rack with temperatures of the cooling liquid for June of 2012;
- The operations log of the vapor recovery unit for EU P002: LUWA II for the time frame of September 2012 and January 2013; and
- The average temperature logs of the cooling liquid for the vapor recovery system for EU P002: LUWA II for September 2012;

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 Megan Murphy at 216-664-4258. All correspondence with CDAQ must include the Ohio EPA facility identification number for Chemical Solvents: 13-18-00-7651.

Sincerely,

Valencia White

Chief of Enforcement, CDAQ

VW/mm

cc: Tony Dattilo, Consultant - EnviroMatrix
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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