



**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 4623  
RETURN RECEIPT REQUESTED**

2/20/13

Thomas Hensley  
Plant Manager  
Sherwood Valve, LLC  
7900 Hub Parkway  
Valley View, OH 44125

**FACILITY ID: 13-18-00-6406**

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

Dear Mr. Hensley:

On 12/17/12, the Cleveland Division of Air Quality (CDAQ) inspected Sherwood Valve, LLC (Sherwood) located at 1201 W. 65<sup>th</sup> St. in Cleveland.

On 12/24/12, CDAQ issued a Notice of Violation requesting that Sherwood:

- Submit a corrective action plan outlining the steps that will be taken to bring the south baghouse serving emissions unit (EU) P001: Electric Induction Furnace and Horizontal Casting Machine into compliance with the pressure drop range specified in Permit to Install/Operate (PTIO) renewal #P0094571, Part C(1)(d)(1).
- Provide a sample of a recordkeeping form for obtaining all investigation and corrective action related information for pressure drop deviations as specified in PTIO renewal #P0094571, Part C(1)(d)(2),(3).
- Resubmit the Permit Evaluation Report (PER) for the reporting period 7/1/11 through 6/30/12 noting the pressure drop deviations, failure to report not having conducted investigations of deviations, failure to report no corrective action steps taken and failure to report not maintaining proper records of investigations and corrective actions in the format prescribed in PTIO renewal # P0094571, Part C (1)(e)(1)(a-e).

On 1/7/13, CDAQ received an electronic version of a corrective action plan and a request for a compliance deadline extension.

On 1/9/13, CDAQ issued a Receipt of Corrective Action Plan (RCAP) letter acknowledging the current steps being taken to operate the baghouse within the specified pressure drop range and granting the compliance deadline extension.

On 2/19/13, CDAQ received hard copy results of Sherwood's evaluation of the baghouse with the manufacturer and confirmation of implementation of recommended actions. Records of compliant pressure drop readings were provided along with a sample copy of the baghouse investigation report.



On 2/20/13, CDAQ received the hard copy of the amended PER for the reporting period 7/1/11 through 6/30/12.

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 Sherwood Valve, LLC: 13-18-00-6406.

Sincerely,

A handwritten signature in black ink, appearing to read "Valencia White".

Valencia White  
Chief of Enforcement, CDAQ

VW/dd *uc*

cc: John Paulian, Ohio EPA Central Office  
Brian Dickens, U.S. EPA Region V  
L:\Data\Facilities\1318006406\2012-12-17 ROV+NEAR.docx



## Annual Permit Evaluation Report (PER)

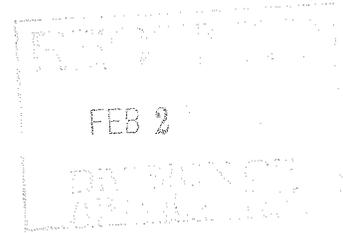
**Due Date:** Aug 15, 2012

**Reporting Period:** 07/01/2011 - 06/30/2012

**Facility Name:** Sherwood Valve LLC  
**Facility ID:** 1318006406  
**Facility Address:** 1201 W. 65TH ST.  
CLEVELAND, OH 44102

**Primary Contact:** THOMAS HENSLEY  
**Mailing Address:** 7900 HUB PKWY  
CLEVELAND, OH 44125-5713

**Phone:** (216)961-1570  
**E-mail Address:**



The facility address information given above was populated by Ohio EPA's most current database of information. If the above information has changed or is incorrect, please indicate the correct information below. You may also complete this PER electronically using the eBusiness Center - Air Services at [ebiz.epa.ohio.gov](http://ebiz.epa.ohio.gov) on the Internet.

*Indicate changes below.*

<i>Facility Name:</i>	
<i>Facility Address:</i>	
<i>Reason for Facility Address Change:</i>	
<i>Primary Contact:</i>	
<i>Mailing Address:</i>	
<i>Phone Number:</i>	
<i>E-mail Address:</i>	



Table I: Emissions Units with Issued PTIOs

<i>EU ID*</i>	<i>EU Description</i>	<i>Company Equipment ID</i>	<i>Permit Number</i>	<i>PTIO Effective Date</i>
P001	Inductotherm Furnace with 5,000 lb capacity for Brass Rod Casting Line	Electric Furnace	P0094571	9/29/2011

\* List any additional emissions units (EUs) that have been issued a PTIO that are not included in the list above.

A "Detailed Emissions Unit (EU) Form" (attached) must be submitted for each EU listed in Table I to satisfy PER reporting obligations. In addition to the PER, please remember that your PTIOs may specify other state or federal reporting requirements.

**Additional Information and Corrections:**

Please list below any additional information you need to communicate with Ohio EPA. At a minimum, identify if you have any EU(s) that were permanently shutdown, EU(s) that will not be installed or modified, or EU(s) not in operation during the reporting period. See the "Annual Permit Evaluation (PER) Form FAQs" document for an explanation and additional examples or relevant information.


**Report Responsibility:**

This PER, including any accompanying information, is required under the authority of the director of the Ohio Environmental Protection Agency. [Ohio Revised Code 3704.03(I)] Failure to submit this PER, including any accompanying information, or falsifying this PER, including any accompanying information, may result in civil or criminal penalties in accordance with applicable state law.

**Assistance With This Form:**

If you have any questions please see the attached "Annual PER Form FAQs" document or contact the **Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 or Cleveland Division of Air Quality at (216)664-2297.**



Detailed Emissions Unit Form(s)

PER Reporting Period: 07/01/2011 - 06/30/2012

Detailed Emissions Unit Form Instructions\*:

- 1. Please complete questions A and B for each emissions unit (EU) that has been issued a PTIO. In addition, either confirm the accuracy of the information provided or change the information accordingly.
2. If you indicated "yes" for question A or B, for each deviation or exceedance that occurred during the reporting period, please provide an attachment with the following information:
a. EU ID;
b. dates and/or duration;
c. description of deviation or exceedance including probable cause;
d. description of corrective action(s) if taken; and
e. if no corrective action(s) were taken, then why not?
3. If applicable, for each visible emission (VE) incident that occurred during the reporting period, please provide an attachment with the following information:
a. EU ID;
b. dates and/or duration; and
c. additional information as required per the applicable PTIO.

\* For further explanation, or if you have any questions, please see the attached "Annual PER Form FAQs" document or contact the Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 or Cleveland Division of Air Quality at (216)664-2297.

PER Detailed EU Form

EU ID: P001

Facility ID: 1318006406

EU Description: Inductotherm Furnace with 5,000 lb capacity for Brass Rod Casting Line

Please provide date below if not present.

Table with 2 columns: Date description and Date value. Rows include Completion of initial installation date (01/01/1982), Begin installation/modification date (01/01/1982), and Commence operation after installation or latest modification date (01/01/2000).

Were there any deviations or exceedances from the following PTIO requirements?

- A. Operational restrictions or emission limitations? Yes X No
B. Monitoring, record keeping, or reporting requirements? Yes X No

C. If Yes for A or B above, then submit the appropriate information as specified in the Detailed Emissions Unit Form Instructions #1 and #2 above. If any visible emission incident occurred during the reporting period, then submit the appropriate information as specified in #3.

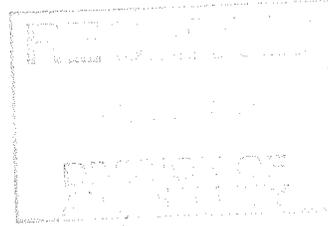
# SHERWOOD VALVE, LLC

CLEVELAND OPERATIONS

1201 WEST 65<sup>TH</sup> STREET

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

Ref: Sherwood Valve  
Permit # P0094571  
Facility ID: 1318006406



Dear Mr. DeChant,

Deviations during the time period of 07/01/2011- 06/30/2012, in reference to the violation of failure to maintain pressure drop readings on Emissions Unit P001.

The violations in general from 07/01/2011 thru 06/30/ 2012 were due to the amount of time we purged the bag house on the EU unit P001. Sherwood did not recognize the 3-6 range correctly and did not react to anything under 3. The assumption Sherwood made was the specified range could not go higher than 6 . We concentrated on this and our process of purging the bag house for the amount time we did on a daily basis would take us below 3 for a short period of time and as we continued to run the number would climb back into the required range.

Sherwood fully understands the requirement and will react with the proper form for any deviations that fall out of the specified range

Sherwood has investigated with our engineers and consulted a manufacture of bag house equipment. The bag house in question has the ability to stay within the 3-6 range that is required. The purging process on this particular unit must be managed manually in order stay within the required 3-6 range. We have implemented the following to allow us to stay in the specified range.

- The amount of time allowed to shake the bag house has been reduced from 5 minutes to 1 minute. This allows the pressure to remain in the 3-6 range. We have demonstrated over the past three weeks that we can stay within the specified range with adding multiple purging processes through out the day.
- We have installed an alarm on the high limit (6) which will initiate the operators to attend the bag house to reduce the level.
- We have implemented a formal investigation form for whenever we are out of compliance.

Thank you,  
Tom Hensley  
Plant Manager  
Cleveland Operations

# SHERWOOD VALVE, LLC

CLEVELAND OPERATIONS

1201 WEST 65<sup>TH</sup> STREET

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

Ref: Sherwood Valve  
Permit # P0094571  
Facility ID: 1318006406



Dear Mr. DeChant,

In reference to the violation of failure to maintain pressure drop readings across the south bag house within Permit to Install/Operate specified range

Sherwood has investigated with our engineers and consulted a manufacture of bag house equipment. The bag house in question has the ability to stay within the 3-6 range that is required. The purging process on this particular unit must be managed manually in order stay within the required 3-6 range. We have implemented the following to allow us to stay in the specified range.

- The amount of time allowed to shake the bag house has been reduced from 5 minutes to 1 minute. This allows the pressure to remain in the 3-6 range. We have demonstrated over the past three weeks that we can stay within the specified range with adding multiple purging processes through out the day.
- We have installed an alarm on the high limit (6) which will initiate the operators to attend the bag house to reduce the level.
- We are looking at the possibility of replacing the bag house all together due to the age and complexity of automating the controls on the existing unit.
- We have implemented a formal investigation form for whenever we are out of compliance. Please see the attached form.

The violations in general from 2012 on the south bag house were due to the amount of time we purged the bag house. Sherwood did not recognize the 3-6 range correctly and did not react to anything under 3. The assumption Sherwood made was the specified range could not go higher than 6 . We concentrated on this and our process of purging the bag house for the amount time we did on a daily basis would take us below 3 for a short period of time and as we continued to run the number would climb back into the required range.

Sherwood fully understands the requirement and will react with the proper form for any deviations that fall out of the specified range

Thank you,  
Tom Hensley  
Plant Manager  
Cleveland Operations

**Bag House Investigation Report**

**2013**

Date \_\_\_\_\_

Time \_\_\_\_\_

Bag House \_\_\_\_\_

Baghouse reading \_\_\_\_\_

**Investigation**

Date \_\_\_\_\_

Name of employee \_\_\_\_\_

Findings/recommendations \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of corrective action \_\_\_\_\_

Date deviation ended \_\_\_\_\_

Time deviation ended \_\_\_\_\_

Total time of deviation  
(calculate in minutes) \_\_\_\_\_

Reading after corrective action \_\_\_\_\_

Personnel who performed work \_\_\_\_\_



Baghouse Readings 2013			
	North Baghouse	South Baghouse	Comments
1-Jan	No prodcution	No prodcution	
2	4.1	5.2	
3	4.5	3.6	
4	4	3.5	
5	5	4.8	
6	No prodcution	No prodcution	
7	5	3.2	
8	5.2	3.6	
9	4,7	3.9	
10	4.1	4	
11	4.2	3.5	
12	No prodcution	No prodcution	
13	No prodcution	No prodcution	
14	3.8	4.2	
15	4	4.8	
16	4.2	3.5	
17	4.5	3.2	
18	4.5	3.1	
19	No prodcution	No prodcution	
20	No prodcution	No prodcution	
21	5	4.8	
22	4.5	3.6	
23	4	3.5	
24	4	3.9	
25	4.5	4	
26	5	4.1	
27	No prodcution	No prodcution	
28	4	4.2	
29	4.5	4.3	
30	4	4.2	
31	4	4.1	