



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 8157
RETURN RECEIPT REQUESTED**

March 8, 2013

Kathy Gargasz
Environmental Coordinator
The Lincoln Electric Company
22801 St. Clair Avenue
Euclid, OH 44117

**HIGH PRIORITY FACILITY
NON-HPV**

FACILITY ID: 13-18-20-2137

NOTICE OF VIOLATION: Operating 4 emergency electrical generators and 2 water pumps without permits and exceeding the daily-weighted VOC content limitation on Emission Unit (EU) K069: Paint Spray Booth 20

Dear Ms. Gargasz:

On February 13 and February 21, 2013, the Cleveland Division of Air Quality (CDAQ) inspected The Lincoln Electric Company located at 22801 St. Clair Avenue in Euclid. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

The Lincoln Electric Company has been operating the following 6 EUs (4 emergency generators and 2 water pumps) without applying for permits:

- Building 1 / 2 Emergency Generator – 150 hp (since June 1, 1986),
- Building 1 / 2 Water Pump – 122 hp (since June 1, 1986),
- Building 3 Emergency Generator – 100 hp (since June 1, 2005),
- Building 3 Water Pump – 188 hp (since June 1, 1956),
- Building 4 Emergency Generator – 85 hp (since June 1, 1968) and
- Building 5 Emergency Generator – 100 hp (since December 31, 2008).



Operating these six (6) EUs without permits is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(c) and Ohio Revised Code (ORC) Section 3704.05(F).

The Lincoln Electric Company also failed to notify CDAQ within 45 days of a daily-weighted average VOC content exceedance that occurred on February 17, 2012, on EU K069: Spray Paint Booth 20. CDAQ was not notified until July 24, 2012, in the 2nd quarter 2012 deviation report. This is a violation of Title V permit #P0105640: Emission Unit Terms and Conditions (6)(e)(1), Permit-to-Install #13-3470: Reporting Requirements (1), OAC Rule 3745-77-07(C)(1) and ORC Section 3704.05(J)(2).

On February 25, 2013, Permit By Rule notification forms were electronically submitted via the eBusiness Center for the six (6) EUs requiring permits. While that violation has been adequately addressed, the daily-weighted average VOC content exceedance violation on EU K069: Spray Paint Booth 20 remains unresolved.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that within thirty (30) days of your receipt of this letter, The Lincoln Electric Company electronically submit, via the Ohio EPA eBusiness Center, the following 2 items:

1. An exceedance report for EU K069: Spray Paint Booth 20 that reports the deviation that occurred on February 12, 2012, and
2. A corrective action plan outlining what steps will be taken to avoid another daily-weighted average VOC content exceedance in the future.

If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

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 Andrew Marantides at (216) 420-8049. All correspondence with CDAQ must include the Ohio EPA facility identification number for The Lincoln Electric Company: 13-18-20-2137.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/AM *lx*

cc: Roland Lacy, CDAQ
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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