



City of Cleveland
Frank G. Jackson, Mayor

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

**CERTIFIED MAIL 7012 2210 0000 5209 4661
RETURN RECEIPT REQUESTED**

3/18/13

Hwang Jong Lee
Bill's Dry Cleaning
2279 Lee Rd.
Cleveland Heights, OH 44118

FACILITY ID: 13-18-16-8135

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

Dear Mr. Lee:

On 8/20/12 and 8/21/12, the Cleveland Division of Air Quality (CDAQ) inspected Bill's Dry Cleaning (Bill's) located at 2279 Lee Rd. in Cleveland Heights.

On 8/27/12, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requesting that for the months of September, October and November of 2012, Bill's submit copies of bi-weekly leak checks including at least one monthly check using the Perchloroethylene (PERC) gas analyzer, rolling 12-monthly PERC usage logs and an initial confirmation statement that records will be maintained on-site.

On 9/20/12, CDAQ spoke with Wendy Pykare (Bill's representative/interpreter) and clarified the required record keeping requested in the NOV. Additionally, she acknowledged that records were now being maintained on site.

On 10/12/12, CDAQ received a facsimile transmission that included records of bi-weekly leak checks with no indications that the PERC gas analyzer had been used or the dates of the inspections, daily/weekly/monthly poundage of clothes cleaned during September and an attempt at rolling 12-month PERC purchase records.

On 10/23/12, CDAQ issued a Receipt of Corrective Action Plan (RCAP) letter stating that the initial attempt at compliant record keeping was noted, however, several issues required additional attention. No actual inspection dates were indicated in Section A of the recordkeeping worksheet (copy was provided with areas of concern circled/highlighted). Also, the worksheet showed all four weeks of inspections having been conducted manually (feel, sight and smell). The RCAP reiterated that you were required to conduct at least one monthly check using the PERC gas analyzer. In regards to Section D where the running total of PERC purchases was recorded the record started with a zero and did not accurately reflect the rolling 12-month PERC usage.

The 10/23/12 RCAP clarified that you were expected to comply with entering the dates of the weekly inspections in Section A along with conducting at least one monthly leak check using the PERC gas analyzer.



The 10/23/12 RCAP letter also requested that you estimate the prior 11 months of PERC purchases and enter that number as the running total from the prior month.

The corrections noted above were to be included with the submission of the records for October 2012 due by 11/02/12.

On 11/14/12, CDAQ received a facsimile transmission that included records of leak checks with no indications of the dates of the inspections or initials of facility personnel conducting the inspections, a record that leaks were detected on the door and filter gaskets with no repairs conducted, daily/weekly/monthly poundage of clothes cleaned during October and another attempt at rolling 12-month PERC purchase records.

On 11/20/12, CDAQ issued a second RCAP letter indicating you were expected to comply with submitting a correct version of the records for November 2012 by 12/14/12 and ensure that the following information was included:

- Date of inspection
- Name and/or initials of individual conducting the inspection
- Rolling 12-month PERC purchase records
- Repair/maintenance records for leaks detected during inspections

On 12/12/12, CDAQ received a facsimile transmission that included records of leak checks with no indications of the dates of the inspections, a record that leaks were detected on the door and filter gaskets with no repairs conducted, daily/weekly/monthly poundage of clothes cleaned during November and another attempt at rolling 12-month PERC purchase records.

On 12/14/12, CDAQ issued a Third RCAP letter acknowledging receipt of the 12/12/12 facsimile and noting the outstanding deficiencies in the recordkeeping. CDAQ enclosed the 2012-2013 Dry Cleaner Compliance Calendar from the State of Pennsylvania (Korean Translation) and excerpts from the State of Wisconsin's Dry Cleaner Compliance Calendar that included a Korean Translation of the recordkeeping requirements. CDAQ clarified that it was our intention that this would provide some clarification regarding the on-going omissions in the recordkeeping attempts provided to date.

The Third RCAP established that you were expected to comply with submitting a correct version of the records for December 2012 by 1/11/13. Bill's was requested to ensure that the following information was included:

- Date of inspection
- Rolling 12-month PERC purchase records
- Repair/maintenance records for leaks detected during inspections

No response was received from Bill's by the 1/11/13 deadline established in the 12/14/12 RCAP.

CDAQ had previously provided Bill's with contact information for the Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) in an additional effort to provide resources for their compliance efforts. On 1/22/13, CDAQ established contact with OCAPP personnel and confirmed that Bill's had not solicited their help.

On 2/5/13, CDAQ requested OCAPP to initiate contact with Bill's personnel.



On 2/21/13, OCAPP District Representative, Adrienne La Favre met with Bill's personnel at your facility. Ms. La Favre reviewed PERC calculations and recordkeeping requirements. She provided a calendar from New Jersey written in Korean to explain the different parts of the Ohio Dry Cleaner's Compliance Calendar.

On 2/22/13, Ms. La Favre sent Bill's a letter summarizing the 2/21/13 meeting. The letter included instructions for Bill's to forward copies of the January and February calendar pages to CDAQ inspector Dave DeChant.

On 3/11/13, CDAQ received a facsimile of the January and February calendar pages with correct recordkeeping entries reflected throughout. Additionally, CDAQ was able to locate an equipment repair receipt previously submitted for 9/17/12 maintenance that was required after leak detection during an inspection.

Bill's is expected to maintain current and accurate recordkeeping on-site to establish on-going compliance with your Permit to Install/Operate (PTIO) terms and conditions.

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 Bill's Dry Cleaning: 13-18-16-8135.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dd **UK**

cc: Wendy Pykare, Bill's Dry Cleaning Representative
Adrienne La Favre, OCAPP
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 22, 2013

Ms. Young Hee Lee
Bill's Dry Cleaning
22790 Lee Road
Cleveland, OH 44118

RE: Facility visit on February 21, 2013

Dear Ms. Lee:

On February 21, 2013, I visited you. You asked me to help you understand how to keep dry cleaning records. You have problems keeping the PERC usage records.

During our meeting I helped you add up the amount of PERC you used in 2012. You bought PERC three times. You found one bill, but need to find the other two. I showed you how to fill out the PERC box on the calendar. You should find the EXACT dates you bought PERC in 2012 and add the dates to the table we worked on. Send a copy of the table to Mr. De Chant. Also send Mr. De Chant a copy of the January and February pages of the calendar.

I also explained that you have to write down the date you do inspections of the dry cleaning machine. You said you would start writing the date, not just your name. We also talked about other parts of the calendar.

I used a calendar from New Jersey written in Korean to explain the different parts of the Ohio calendar. I left this information with you. I think you now understand how to keep the records.

It was a pleasure meeting you. I will be happy to help you again. Call me at 330-963-1250 or by e-mail at Adrienne.LaFavre@epa.ohio.gov.

Sincerely,

Adrienne La Favre
District Representative
Office of Compliance Assistance and Pollution Prevention

ALF:bo

ec: Rick Carleski, OCAPP, CO, OEPA
Jennifer Kurko, DO, NEDO, OEPA
David DeChant

EPA Compliance Records

MAR 11 2013

Section A. Weekly Leak Inspection Log and Repair Records

Equipment Inspected	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	Date Parts Ordered	Date Parts Received	Date Repaired	Description of Repair
Staff Initials	L. Lee								
Are Components Leaking? Y= Yes, N= No (Circle One)									
Joints & Pipe Connections	N Y	N Y	N Y	N Y	N Y				
Door & Filter Gaskets	N Y	N Y	N Y	N Y	N Y				
Drumumps	N Y	N Y	N Y	N Y	N Y				
Solvent Tanks	N Y	N Y	N Y	N Y	N Y				
Water Separators	N Y	N Y	N Y	N Y	N Y				
Muck Cooker	N Y	N Y	N Y	N Y	N Y				
Still	N Y	N Y	N Y	N Y	N Y				
Exhaust Dampers	N Y	N Y	N Y	N Y	N Y				
Diverter Valves	N Y	N Y	N Y	N Y	N Y				
Filter Housings	N Y	N Y	N Y	N Y	N Y				
Evaporator/Mister	N Y	N Y	N Y	N Y	N Y				
Method of Inspection:	P D	P D	P D	P D	P D				
Circle P for Feel, Sight or Smell, or D for Detector (circle one)									

Section B. Weekly Refrigerated Condenser/Adsorber Monitoring Log

Refrigerated Condenser Pressure/Temperature Monitoring					
	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5
Pressure — Low/High (required if gauges present) or Outlet temperature (if no pressure gauges present)	1	1	1	1	1
Is the pressure in the range specified by the manufacturer's operating instructions or is the temperature less than or equal to 45°F (7.2°C)?	Y N	Y N	Y N	Y N	Y N
Carbon Adsorber PERC Concentration Monitoring					
PERC Concentration — carbon adsorber exhaust (PPMV)					
Is PERC Concentration Less Than 100 PPMV?	Y N	Y N	Y N	Y N	Y N

Section D. PERC Purchases Running Total

Running Total from Last Month	105	1. 705 (gal)
PERC Purchased in JANUARY 2012	0	2. 0 (gal)
Subtract Line 2 from Line 1, write result here	45	3. 105 (gal)
Total gallons of PERC bought this month (log each purchase below)	0	4. 0 (gal)
Add Lines 3 and 4, write total on Line 5 This is your new 12-Month Running Total	45	5. 105 (gal)
PERC purchases this month:		
Purchase Date		Gallons
		0

Section C. Weekly Solvent and Waste Container Inspection Log

WEEK 1 | WEEK 2 | WEEK 3 | WEEK 4 | WEEK 5

EPA Compliance Records

Section A. Weekly Leak Inspection Log and Repair Records

Date Inspected	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	Date Parts Ordered	Date Parts Received	Date Repaired	Description of Repair
Staff Initials	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>				
Are Components Leaking? Y= Yes, N= No (Circle One)									
Losses & Pipe Connections	N Y	N Y	N Y	N Y	N Y				
Door & Filter Gaskets	N Y	N Y	N Y	N Y	N Y				
Pumps	N Y	N Y	N Y	N Y	N Y				
Solvent Tanks	N Y	N Y	N Y	N Y	N Y				
Water Separators	N Y	N Y	N Y	N Y	N Y				
Muck Cooker	N Y	N Y	N Y	N Y	N Y				
Still	N Y	N Y	N Y	N Y	N Y				
Exhaust Dampers	N Y	N Y	N Y	N Y	N Y				
Diverter Valves	N Y	N Y	N Y	N Y	N Y				
Filter Housings	N Y	N Y	N Y	N Y	N Y				
Evaporator/Mister	N Y	N Y	N Y	N Y	N Y				
Method of Inspection: Circle P for Feel, Sight or Smell; or D for Detector (circle one)	P D	P D	P D	P D	P D				

Section B. Weekly Refrigerated Condenser/Adsorber Monitoring Log

Refrigerated Condenser Pressure/Temperature Monitoring					
	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5
Pressure — Low/High (required if gauges present) or Outlet temperature (if no pressure gauges present)	1 38	1 38	1 38	1 38	1
Is the pressure in the range specified by the manufacturer's operating instructions or is the temperature less than or equal to 45°F (7.2°C)?	Y N	Y N	Y N	Y N	Y N
Carbon Adsorber PERC Concentration Monitoring					
PERC Concentration — carbon adsorber exhaust (PPMV)					
Is PERC Concentration Less Than 100 PPMV?	Y N	Y N	Y N	Y N	Y N

Section D. PERC Purchases Running Total

Running Total from Last Month	1. 108 (gal)
PERC Purchased in FEBRUARY 2012	- 15 2100 (gal)
Subtract Line 2 from Line 1, write result here	3. 98 (gal)
Total gallons of PERC bought this month (log each purchase below)	4. 0 (gal)
Add Lines 3 and 4, write total on Line 5 This is your new 12-Month Running Total	5. 98 (gal)
PERC purchases this month:	
Purchase Date	Gallons
	0

Section C. Weekly Solvent and Waste Container Inspection Log

	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5
Containers in Good Condition?	Y N	Y N	Y N	Y N	Y N

INVOICE

INDUSTRIAL EQUIPMENT SALES
 34011 SUMMERSET DRIVE
 SOLON, OH 44139

No.

INVOICE DATE 9-17-12
CUSTOMER'S ORDER NO.

SOLD TO: Bills Cleaners

SHIP TO:

SALESPERSON	SHIPPED VIA	TERMS	F.O.B.
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QTY. ORDERED	QTY. SHIPPED	DESCRIPTION	UNIT	AMOUNT
1		Repair - Lint door replace Seal		65 -
1		Gasket		42 81
1		Ups		11 45
1		Travel		25 -
				<u>144 26</u>

adams 872

INVOICE