



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 7011 3500 0000 1759 8195
RETURN RECEIPT REQUESTED**

April 1, 2013

Do So
Ledgewood Cleaners
17100 Royalton Road
Strongsville, OH 44136

NON-HPV

FACILITY ID: 13-18-55-6769

NOTICE OF VIOLATION: Operating without a permit, failure to repair leaking equipment, failure to perform required recordkeeping and failure to purchase a halogenated hydrocarbon detector

Dear Mr. So:

On March 20, 2013, the Cleveland Division of Air Quality (CDAQ) inspected Ledgewood Cleaners located at 17100 Royalton Road in Strongsville. This letter serves as notification that you are operating a source in violation of the following applicable air statutes, air regulations, or air permit conditions.

Ledgewood Cleaners has been operating Emission Unit (EU) D001: Forenta D-235 Dry-To-Dry Dry Cleaning Machine without a permit since taking over ownership on October 1, 2009. This is a violation of Ohio Administrative Code (OAC) Rule 3745-31-02(A)(1)(c) and Ohio Revised Code (ORC) Section 3704.05(F).

During the March 20, 2013 compliance inspection, CDAQ utilized a halogenated hydrocarbon detector and found that the main door hatch, still door, primary lint filter and button trap were leaking perchlorethylene (PERC) on EU D001. This is a violation of Title 40 Code of Federal Regulations (CFR) Part 63 Subpart M Section 63.322(k) and OAC Rule 3745-21-09(AA)(1)(e).

Ledgewood Cleaners has also failed to perform the following required recordkeeping items:



Perform and record weekly perceptible leak checks, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.322(k) and OAC Rule 3745-21-09(AA)(3) and (4)(b);

Conduct a monthly leak check using a halogenated hydrocarbon detector, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.322(k) and 63.322(o)(1)(i);

Record the monthly PERC usage, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d)(1);

Record the rolling 12-month total PERC usage, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d)(2);

Maintain records of 5 years of PERC purchases, which is a violation of Title 40 CFR Part 63 Subpart M Section 63.324(d);

Measure and record weekly the exhaust temperature on the outlet of the refrigerated condenser which is a violation of Title 40 CFR Part 63 Subpart M Section 63.323(a)(1).

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Ledgewood Cleaners submit a Permit To Install and Operate (PTIO) application and Emissions Activity Category (EAC) form for EU D001, within 30 days of receipt of this letter, to the following address:

Permit Section
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ also request that Ledgewood Cleaners submit the following five (5) items:

1. Copies of the invoices for the gaskets and/or replacement equipment for the four (4) leaking components (main door hatch, still door, primary lint filter and button trap) and the date on which repairs/installations occur;
2. A copy of the halogenated hydrocarbon detector purchase invoice;
3. A copy of a sample of the monthly PERC usage as well as rolling 12-month PERC usage totals;
4. A copy of the weekly recording of the exhaust temperature on the outlet of the refrigerated condenser;
5. A copy of the weekly recording of perceptible leak checks.



The five (5) items requested above shall be sent to the following enforcement representative:

Andrew Marantides
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within thirty (30) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

The appropriate permit application(s) and supplemental form(s) are included with this letter. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

Permit-to-install/operate (PTIO) applications may be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>. An account is required to be created and a pin number assigned.

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.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or (614) 644-3469 or (800) 329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

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 Ledgewood Cleaners: 13-18-55-6769.

Sincerely,

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

Valencia White
Chief of Enforcement, CDAQ

VW/AM *lk*

cc: Ynes Arocho, 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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encl: PTIO application and EAC form