



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 4777
RETURN RECEIPT REQUESTED**

4/17/13

Matthew S. Beverstock
Warwick Products
5350 Tradex Parkway
Cleveland, OH 44102-5887

FACILITY ID: 13-18-00-5003

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

Dear Mr. Beverstock:

On 1/15/13, the Cleveland Division of Air Quality (CDAQ) inspected Warwick Products (Warwick) located at 5350 Tradex Parkway in Cleveland.

On 1/24/13, CDAQ issued a Notice of Violation (NOV) requesting that Warwick electronically submit:

- The 2011 Permit Evaluation Report (PER) for the period 9/22/11-12/31/11 and the Quarterly Deviation Reports for 2011 and 2012 for both emissions units (EUs) K001: (Old) Paint Spray Booth with Dry Filtration System for Particulate and K002: (New) Paint Spray Booth with Dry Filtration System for Particulate through the Ohio EPA's eBusiness Center at <https://ebiz.epa.ohio.gov/>.

Additionally, Warwick was requested to provide:

- A sample recordkeeping form that would track all required VOC, coating and cleanup material information noted above for each EU in the Permit to Install/Operate (PTIO) specified format.
- A copy of the manufacturer's recommendations specific to inspections of the dry particulate filters.
- A sample recordkeeping form that will track all the required inspection documentation for each EU as specified in the PTIO.

On 2/15/13 and again on 2/20/13, CDAQ sent emails to Warwick requesting a response to the 1/24/13 NOV as no communication had been received.

On 2/20/13, CDAQ received an email from John Heim at Warwick indicating a response to the NOV would be forthcoming during the week of 2/25/13.



On 2/27/13, CDAQ received an email from Warwick indicating the 2011 PER had been submitted, and requesting a telephone call to clarify details specific to the Quarterly Deviation Reports (QDRs).

On 2/27/13, CDAQ personnel spoke with Mr. John Heim regarding the QDRs. It was explained that attachments to the reports demonstrating Warwick's recordkeeping that addressed all points specified in the PTIO would be sufficient to establish compliance.

On 2/28/13, CDAQ received an email from Warwick that confirmed submission of the past due PER for 2011 and for the current reporting period of 2012 (Due 2/15/13), along with indication that the QDRs for the past two years had also been submitted electronically through the Ohio EPA's eBusiness Center. Additionally, attachments of the Daily Coating Usage Reporting maintained separately for EUs K001 and K002 were included.

Upon review of the attachments and electronic QDRs submitted through the eBusiness Center, CDAQ determined that the information provided was insufficient to establish compliance with the PTIO specifications.

On 2/28/13, CDAQ sent an email and left a voice mail message both requesting a return call to discuss the outstanding issues with the recordkeeping and reporting.

On 3/5/13, CDAQ confirmed a mutually convenient date/time of 1:30 pm on 3/7/13 for Warwick personnel to come to CDAQ's offices to facilitate clarification of steps required by Warwick to attain compliance status.

On 3/7/13, CDAQ personnel met with Warwick representatives, John Heim and Dave Miller at the CDAQ offices. The ensuing meeting included a line by line review of PTIO #: P0108147 Part C, (1)(a) through (f). Clarification regarding the pertinent information to be captured by Warwick's tracking form was discussed.

Closing summary statements offered by Warwick at the 3/7/13 meeting established 3/15/13 as a compliance deadline for:

- Electronically re-submitting corrected QDRs
- Submitting sample recordkeeping forms that would track all required VOC, coating and cleanup material information noted above for each EU in the PTIO specified format
- Submitting a sample recordkeeping form that will track all the required inspection documentation for each EU as specified in the PTIO. And, copy of the manufacturer's recommendations specific to inspections of the dry particulate filters.

On 3/19/13, CDAQ received an email from Warwick that included the following narrative:

"Attached is Maintenance and Operation Manuals for both booths. Also attached is a mock up (sic) of the spreadsheet we're working on filling in for the 2012 year as well as using as our standard spreadsheet for recording all date (sic) moving forward. I also plan on extending that spread sheet to calculate on another tab the monthly totals and then annual totals, all based off our daily totals.



We are working now to get these spreadsheets filled out and completed and submitted in quarterly reports for last year and as I mentioned also going forward. I know I cannot ask is this all you need, but does this spreadsheet cover the missing data your (sic) requiring at the moment.”

On 3/21/13, CDAQ issued a Receipt of Corrective Action Plan (RCAP) letter that confirmed the submission of the Dry Particulate System Operation Manuals and the “mock up” spreadsheet. The RCAP letter clarified that this still did not satisfy the compliance deadline obligations established during the 3/7/13 meeting.

Specifically, the corrected QDRs were still outstanding; the spreadsheet did not address all required information collection in the PTIO specified format, and no recordkeeping form for tracking the required inspections of the Dry Particulate System had been provided.

The RCAP letter stipulated that you were expected to comply with contacting CDAQ within ten (10) days of Warwick’s receipt of the RCAP letter.

On 4/12/13, Warwick uploaded all outstanding documentation through Ohio EPA’s eBusiness Center.

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 Warwick Products: 13-18-00-5003.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dd *uk*

cc: John Heim, Warwick Products
David Miller, Warwick Products
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
L:\Data\Facilities\1318005003\2013-1-15 ROV+NEAR.docx



**EPA Air Services
Inspection Records
Booth 1 - 2013**

(K001)

Date of Inspection	Description	Maintenance Needed	Reported By	Deviations
1/1/2013	Weekly Inspection		AL	No
1/8/2013	Weekly Inspection		AL	No
1/15/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No
1/22/2013	Weekly Inspection		AL	No
1/29/2013	Weekly Inspection		AL	No
1/31/2013	Broken Belt	Belt Replaced	AL	No
2/4/2013	Weekly Inspection		AL	No
2/11/2013	Weekly Inspection		AL	No
2/18/2013	Weekly Inspection		AL	No
2/25/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No
3/4/2013	Weekly Inspection		AL	No
3/11/2013	Weekly Inspection		AL	No
3/18/2013	Weekly Inspection		AL	No
3/25/2013	Weekly Inspection		AL	No
4/1/2013	Weekly Inspection		AL	No
4/8/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No



**EPA Air Services
Inspection Records
Booth 2 - 2013**

(K002)

Date of Inspection	Description	Maintenance Needed	Reported By	Deviations
1/1/2013	Weekly Inspection		AL	No
1/8/2013	Weekly Inspection		AL	No
1/15/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No
1/22/2013	Weekly Inspection		AL	No
1/29/2013	Weekly Inspection		AL	No
1/31/2013	Broken Belt	Belt Replaced	AL	No
2/4/2013	Weekly Inspection		AL	No
2/11/2013	Weekly Inspection		AL	No
2/18/2013	Weekly Inspection		AL	No
2/25/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No
3/4/2013	Weekly Inspection		AL	No
3/11/2013	Weekly Inspection		AL	No
3/18/2013	Weekly Inspection		AL	No
3/25/2013	Weekly Inspection		AL	No
4/1/2013	Weekly Inspection		AL	No
4/8/2013	Weekly Inspection	Filters Replace + Floormats Replaced + Greased	AL	No



EPA Air Services Daily Operating Records Jan 2013

Booth 1 (K001)

Monthly Totals

93		290.34			64	16.14			3	QTY	YES/NO	
Date	Hours of Operation	Name of Coating & ID #	VOC Per Gal.	VOC Content	# of Gallons Used	Clean Up Material & ID #	VOC Per Gal.	VOC Content	# of Gallons Used	Metal	Reported By	Deviations
1/2/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No
1/3/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No
1/4/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No
1/7/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No
1/8/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No
1/9/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No
1/10/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No
1/11/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No
1/12/2013	5	Black Primer P61-B1	4.62	18.48	4					<input type="checkbox"/>	AL	No
1/14/2013	4	Vinyl Sealer T67F6	1.95	3.9	2	Laquer Thinner	5.38	5.38	1	<input type="checkbox"/>	AL	No
1/15/2013	4	Flat Top Coat T77F38	4.98	9.96	2					<input type="checkbox"/>	AL	No
1/17/2013	4	Vinyl Sealer T67F6	1.95	3.9	2					<input type="checkbox"/>	AL	No
1/18/2013	4	Satin Top Coat T77F37	5	10	2	Laquer Thinner	5.38	5.38	1	<input type="checkbox"/>	AL	No
1/24/2013	4	Flat Top Coat T77F38	4.98	9.96	2					<input type="checkbox"/>	AL	No
1/25/2013	4	Vinyl Sealer T67F6	1.95	3.9	2					<input type="checkbox"/>	AL	No
1/28/2013	4	Satin Top Coat T77F37	5	10	2	Laquer Thinner	5.38	5.38	1	<input type="checkbox"/>	AL	No
1/29/2013	4	Satin Top Coat T77F37	5	10	2					<input type="checkbox"/>	AL	No
1/30/2013	4	White Primer P61W1	4.46	8.92	2					<input type="checkbox"/>	AL	No
1/31/2013	4	White Primer P61W1	4.46	8.92	2					<input type="checkbox"/>	AL	No



EPA Air Services

Daily Operating Records

Jan 2013

Booth 2 (K002)

Monthly Totals

105		395.74			94		5.38		5		QTY		YES/NO	
Date	Hours of Operation	Name of Coating & ID #	VOC Per Gal.	VOC Content	# of Gallons Used	Clean Up Material & ID #	VOC Per Gal.	VOC Content	# of Gallons Used	Metal	Reported By	Deviations		
1/2/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No		
1/3/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No		
1/4/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No		
1/7/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No		
1/8/2013	6	Tinted Lacquer T-77	5	25	5					<input type="checkbox"/>	AL	No		
1/9/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No		
1/10/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No		
1/11/2013	6	Black Primer P61-B1	4.62	23.1	5					<input type="checkbox"/>	AL	No		
1/12/2013	5	Black Primer P61-B1	4.62	18.48	4					<input type="checkbox"/>	AL	No		
1/14/2013	4	Latex Paint	0	0	4	water	0	0	2	<input type="checkbox"/>	AL	No		
1/15/2013	4	Latex Paint	0	0	4	water	0	0	2	<input type="checkbox"/>	AL	No		
1/17/2013	6	Black Primer P61-B1	4.62	27.72	6					<input type="checkbox"/>	AL	No		
1/18/2013	6	Black Primer P61-B1	4.62	27.72	6					<input type="checkbox"/>	AL	No		
1/24/2013	6	Black Primer P61-B1	4.62	27.72	6					<input type="checkbox"/>	AL	No		
1/25/2013	6	Tinted Lacquer T77	5	30	6					<input type="checkbox"/>	AL	No		
1/28/2013	6	Tinted Lacquer T77	5	30	6					<input type="checkbox"/>	AL	No		
1/29/2013	6	Tinted Lacquer T77	5	30	6	lacquer thinner	5.38	5.38	1	<input type="checkbox"/>	AL	No		
1/30/2013	4	Vinyl Sealer T67-F6	1.95	5.85	3					<input type="checkbox"/>	AL	No		
1/31/2013	4	Vinyl Sealer T67-F6	1.95	5.85	3					<input type="checkbox"/>	AL	No		



EPA Air Services Daily Operating Records Annual Report 2013

Booth 1 (K001)

Monthly Totals

Month	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Cleaner/Day	Hours Sprayed on Metal	Reported By	Deviations
January	93	290.34	3.12	16.14	0.52	0	AL	No
February	56	106.22	1.90	16.14	0.58	0	AL	No
March	104	281.66	2.71	16.14	0.52	0	AL	No
April	0	0	#DIV/0!	0	0.00	0	AL	No
May	0	0	#DIV/0!	0	0.00	0	AL	No
June	0	0	#DIV/0!	0	0.00	0	AL	No
July	0	0	#DIV/0!	0	0.00	0	AL	No
August	0	0	#DIV/0!	0	0.00	0	AL	No
September	0	0	#DIV/0!	0	0.00	0	AL	No
October	0	0	#DIV/0!	0	0.00	0	AL	No
November	0	0	#DIV/0!	0	0.00	0	AL	No
December	0	0	#DIV/0!	0	0.00	0	AL	No

Quarterly Totals

Quarter	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
1st (Jan-Mar)	253	678.22	2.68	48.42	0.54	0	AL	No
2nd (Apr-June)	0	0	#DIV/0!	0	0.00	0	AL	No
3rd (July-Sept)	0	0	#DIV/0!	0	0.00	0	AL	No
4th (Oct-Dec)	0	0	#DIV/0!	0	0.00	0	AL	No

Annual Total

Total Year	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
2013	253	678.22	2.68	48.42	0.13	0	AL	No



EPA Air Services Daily Operating Records Annual Report 2013

Booth 2 (K002)

Monthly Totals

Month	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Cleaner/Day	Hours Sprayed on Metal	Reported By	Deviations
January	105	395.74	3.768952381	5.38	0.173548387	0	AL	No
February	56	106.22	1.90	21.52	0.77	0	AL	No
March	76	343.78	4.52	10.76	0.35	0	AL	No
April	0	0	#DIV/0!	0	0.00	0	AL	No
May	0	0	#DIV/0!	0	0.00	0	AL	No
June	0	0	#DIV/0!	0	0.00	0	AL	No
July	0	0	#DIV/0!	0	0.00	0	AL	No
August	0	0	#DIV/0!	0	0.00	0	AL	No
September	0	0	#DIV/0!	0	0.00	0	AL	No
October	0	0	#DIV/0!	0	0.00	0	AL	No
November	0	0	#DIV/0!	0	0.00	0	AL	No
December	0	0	#DIV/0!	0	0.00	0	AL	No

Quarterly Totals

Quarter	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
1st (Jan-Mar)	237	845.74	3.57	37.66	0.43	0	AL	No
2nd (Apr-June)	0	0	#DIV/0!	0	0.00	0	AL	No
3rd (July-Sept)	0	0	#DIV/0!	0	0.00	0	AL	No
4th (Oct-Dec)	0	0	#DIV/0!	0	0.00	0	AL	No

Annual Total

Total Year	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
2013	237	845.74	3.57	37.66	0.11	0	AL	No



**EPA Air Services
Daily Operating Records
Annual Report 2012**

Booth 1 (K001)

Monthly Totals

Month	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Cleaner/Day	Hours Sprayed on Metal	Reported By	Deviations
January	100	247.1	2.47	75.32	2.43	0	AL	No
February	124	368.29	2.97	37.66	1.35	0	AL	No
March	64	173.57	2.71	10.76	0.35	0	AL	No
April	84	251.8	3.00	5.38	0.18	0	AL	No
May	84	220.03	2.62	10.76	0.35	0	AL	No
June	84	214.7	2.56	22.5	0.75	0	AL	No
July	108	291.66	2.70	16.14	0.52	0	AL	No
August	121	428.31	3.54	16.14	0.52	0	AL	No
September	100	384.72	3.85	16.14	0.54	0	AL	No
October	114	389.38	3.42	10.76	0.35	0	AL	No
November	110	412.8	3.75	10.76	0.36	0	AL	No
December	106	416.56	3.93	10.76	0.35	0	AL	No

Quarterly Totals

Quarter	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
1st (Jan-Mar)	288	788.96	2.74	123.74	1.37	0	AL	No
2nd (Apr-June)	252	686.53	2.72	38.64	0.43	0	AL	No
3rd (July-Sept)	329	1104.69	3.36	48.42	0.53	0	AL	No
4th (Oct-Dec)	330	1218.74	3.69	32.28	0.35	0	AL	No

Annual Total

Total Year	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
2012	1199	3798.92	3.17	243.08	0.67	0	AL	No



EPA Air Services
Daily Operating Records
Annual Report 2012

Booth 2 (K002)

Monthly Totals

Month	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Cleaner/Day	Hours Sprayed on Metal	Reported By	Deviations
January	106	416.56	3.93	10.76	0.35	0	AL	No
February	116	437.8	3.77	10.76	0.38	0	AL	No
March	56	128.87	2.30	5.38	0.17	0	AL	No
April	74	262.2	3.54	10.76	0.36	0	AL	No
May	84	326.34	3.89	10.76	0.35	0	AL	No
June	105	386.73	3.68	16.14	0.54	0	AL	No
July	108	291.66	2.70	16.14	0.52	0	AL	No
August	100	252.5	2.53	27.5	0.89	0	AL	No
September	104	272.31	2.62	10.76	0.36	0	AL	No
October	136	400.22	2.94	10.76	0.35	0	AL	No
November	120	353.35	2.94	37.66	1.26	0	AL	No
December	100	247.1	2.47	75.32	2.43	0	AL	No

Quarterly Totals

Quarter	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
1st (Jan-Mar)	278	983.23	3.54	26.9	0.30	0	AL	No
2nd (Apr-June)	263	975.27	3.71	37.66	0.41	0	AL	No
3rd (July-Sept)	312	816.47	2.62	54.4	0.59	0	AL	No
4th (Oct-Dec)	356	1000.67	2.81	123.74	1.34	0	AL	No

Annual Total

Total Year	Hours Sprayed	Total VOC Content (Coatings)	Average VOC Content Sprayed/Hour	Total VOC Content (Cleaners)	Average VOC Content Sprayed/Day	Hours Sprayed on Metal	Reported By	Deviations
2012	1209	3775.64	3.12	242.7	0.66	0	AL	No