



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

June 27, 2008

**Re: Tuscarawas County  
Complaint 30000278  
Certified: 70063450000190562734**

Mr. Randy Holdsworth  
Holdsworth Industrial Fabricating  
P.O. Box 643  
Zoar, Ohio 44697-0643

Dear Mr. Holdsworth:

I am writing this letter in response to a complaint received by this office on May 9, 2008. The complaint alleges that painting occurs outside at your facility.

On May 29, 2008, I investigated this complaint. You were not in at that time. On June 20, 2008, I met with you at your facility in regard to this complaint. You indicated that occasionally materials are painted outside, behind your building. As I explained at that time, all painting must be done in an enclosure, which is properly vented.

Painting operations are considered air contaminant sources, as defined in Ohio Administrative Code (OAC) rule 3745-31-01(D). The installation of an air contaminant source without obtaining a permit to install is a violation of OAC rule 3745-31-02(A), unless the source is exempted pursuant to OAC rule 3745-31-03. The exemption specific to your painting operation includes the following:

- (kk) Coating applicators with properly designed and operated particulate control devices and venting systems that employ less than five gallons of only air-dried coating material in any one day provided that the applicators are:
  - (i) Not located in a nonattainment area for ozone;
  - (ii) Not subject to limits specified in or specifically exempted from rule 3745-21-09 of the Administrative Code;
  - (iii) Not subject to federal standards of performance for new stationary sources; and
  - (iv) Not located at a facility with actual emissions of twenty-five or more tons of volatile organic materials per year and are not subject to a standard under section 112 of the Clean Air Act.

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If you wish to demonstrate that you meet the exemption in OAC rule 3745-31-03(kk) and avoid the requirement to obtain a permit, you must do the following:

1. submit documentation of past coating usage which shows that the operation never used more than five gallons of air-dried coatings per day; and
2. demonstrate that you are using "properly designed and operated particulate control devices and venting system." This generally consists of exhausting coating booth emissions through filters and through a stack which releases emissions vertically above the roofline, where they can disperse before returning to ground level, reducing the impact on neighbors.

Please submit the coating records and a plan for building a paint booth or enclosure.

If you have any questions, please contact me at 740-380-5217.

Sincerely,



Lisa Duvall  
Environmental Specialist  
Division of Air Pollution Control

LD/mlm