



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-6501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

July 19, 2007

Re: Tuscarawas County  
Complaint 20070310  
**Certified Mail #70063450000190547106**

Mr. Tom Leidner, Sr.  
Bulldog Blasting and Painting  
2206 Brightwood Rd.  
New Philadelphia, Ohio 44643-6771

Dear Mr. Leidner:

I am writing this letter in response to a complaint received by this office on June 29, 2007. The complaint alleges that you are sandblasting outside at your facility on Brightwood Road, New Philadelphia.

On July 10, 2007, I investigated this complaint and spoke to you. Bulldog Blasting and Painting does mechanical work, auto body work and painting. You told me that you do some sandblasting outside. I explained that sandblasting outside is not permitted. All sandblasting must be done in an enclosure so that no dust from the sandblasting is emitted to the ambient air. Painting must be done in an enclosed area with proper filtering and the vent from the paint booth must exit the building above roof level.

Both painting operations and sandblasting 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 exemptions specific to your painting and sandblasting operations include the following:

- (z) Uncontrolled grinding, machining, and sanding operations, abrasive cleaning operations (dry or wet), pneumatic conveying and woodworking operations that have no visible emissions, vent to the inside of a building and emit less than ten pounds per day of non particulate air contaminants.
- (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:
  - (l) Not located in a nonattainment area for ozone;
  - (ii) Not subject to limits specified in (i) 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.

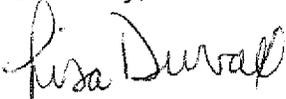
If you wish to demonstrate that you meet the exemptions in OAC rule 3745-31-03 (kk) and (z) and avoid the requirement to obtain a permit, you must do the following:

1. submit documentation of past coating usage which shows that the operation never used more than five gallons of air-dried coatings per day;
2. demonstrate that you are using a "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); and
3. prevent all dust emissions from sandblasting from being emitted to the outside air.

Please submit the aforementioned information by August 3, 2007.

If you have any questions regarding the exemptions or would prefer to submit permit applications, please contact me at this office at (740) 380-5217.

Sincerely,



Lisa Duvall  
Environmental Specialist  
Division of Air Pollution Control

LD/mlm