



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 28, 2011

**Re: Coshocton County
Complaint 30001815
Certified: 70101060000178962310**

Mr. Mike Hammersley
18156 Township Road 284
Coshocton, Ohio 43812

Dear Mr. Hemmersley:

I am writing this letter in response to a complaint received by this office on March 31, 2011. The complaint alleges that paint overspray emissions from your garage are not being controlled.

On April 12, 2011, I investigated this complaint and spoke to you. You indicated that you do body work on vehicles and paint inside your garage. A fan in the wall vents the garage when you are painting. There was not a filter on the vent fan.

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 3745-15-05(E) or 3745-31-03(A).

The permit exemption in OAC rule 3745-15-05(E) is for small sources that emit less than ten pounds per day of air contaminants and less than one ton of hazardous air pollutants per year. To qualify for this exemption, you must demonstrate through daily records that the emissions from the painting operations are less than the levels specified above.

The OAC rule 3745-31-03(A) exemption that may apply to your painting operation is stated below:

- (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 25 or more tons of volatile organic materials per year and are not subject to a standard under section 112 of the Clean Air Act.

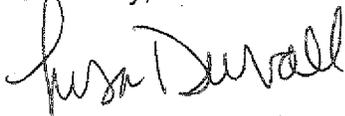
If you wish to demonstrate that you meet the permit exemption in OAC rule 3745-31-03(A)(1)(kk), you must do the following:

1. Submit documentation of past coating usage which shows that the painting operation never used more than five gallons of air-dried coatings per day; and
2. Document that the painting operation has a properly designed particulate matter (paint overspray) control device(s) and venting system that will be operated when the painting operations occur. A properly designed particulate matter control device(s) and venting system will exhaust 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 notify us and maintain appropriate daily records if you believe that the painting operation qualifies for the exemption under OAC rule 3745-15-05(E) or submit the coating records and a plan for upgrading the exhaust system if the exemption under OAC rule 3745-31-03(A) is more appropriate for your painting operation. Please notify us or submit the records and plan within 14 days of receipt of this letter.

If you have any questions regarding this matter or if you need assistance in determining the amount of emissions emitted from the painting operation or which exemption is most appropriate for your painting operation, please contact me at 740-380-5217 or Ralph Witte with our Office of Compliance Assistance and Pollution Prevention at 740-380-5241.

Sincerely,



Lisa Duvall
Environmental Specialist
Division of Air Pollution Control

LD/mlm

Enclosure

Cc: Ralph Witte, OCAPP/SEDO