



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

April 24, 2007

**Re: County Belmont  
Complaint 20070116  
Certified: 70063450000190545546**

Mr. Roman Sutton  
55688 Industrial Drive  
Bridgeport, Ohio 43912

Dear Mr. Sutton:

I am writing this letter in response to a complaint received by this office on April 3, 2007. The complaint alleges that strong odors and fumes are being emitted from your autobody shop at 55688 Industrial Drive, Bridgeport.

On April 12, 2007, I investigated this complaint and spoke to you. You paint inside a building in a paint booth. Even though you indicated that you only paint unassembled car parts, I observed a whole car that was to be painted in the paint booth. There is an exhaust fan in the booth that is hung from the ceiling and pointed towards a window. There were no over spray filters being used. We discussed the exemption requirements in regard to your painting operations. Filters must be used when painting and the fan must vent to duct work and a stack that exits above the roof level of your building.

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 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 non-attainment 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 upgrading the exhaust system within fourteen days of receipt of this letter.

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

Sincerely,



Lisa Duvall  
Environmental Specialist  
Division of Air Pollution Control

LD/mlm