



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kottleski, Director

Re: Richland County
Custom Hardwoods
Premise # 03.70.01.0310
**Notice of Violation (NOV) HPV-
GC7**

November 10, 2010

CERTIFIED MAIL

Chris Fraley, Owner
Custom Hardwoods
220 Mansfield Industrial Pkwy
Mansfield, Ohio 44903

Dear Mr. Fraley:

This letter shall serve as follow-up to the inspection of Custom Hardwoods conducted on October 12, 2010, of the above-referenced facility by Ms. E. Jay Murphy and I. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

Based on our discussions, our observations during the inspection, and a review of the company's files, my findings are as follows:

1. Per Ohio Permit-to-Install and Operate (PTIO) P0103990, issued on 11/13/08, the company is required keep daily usage and emissions records for all coating and clean-up materials used in the spray booth, as identified in terms C.2.d)(1)a. - h. The company is also required keep rolling monthly emissions of Hazardous Air Pollutants (HAPs), as identified in terms C.2.d)(2)a. - g.

Currently the company is recording coating usage for the permitted booth on a hanging wall calendar while only recording the company's ID of each coating and the approximate volume used. The remaining records complying with the permit, terms C.2.d)(1)c. - h. or C.2.d)(2) a. - g, were not available at the time of our inspection and conversations and correspondence with the company have determined that those records have not been accurately kept and are not available. Accordingly, the Ohio EPA is not able to accurately determine the company's current or historical compliance status with the established permit emissions limits.

Failure to properly maintain the required records identified above is a violation of the terms and conditions of PTIO P0103990 and Ohio Revised Code (ORC) 3704.05. To remedy this situation the company must immediately begin keeping records in accordance with the terms and conditions of PTIO P0103990.

2. The permitted spray booth is missing multiple ceiling drop tiles along the right side of the ceiling, when looking toward the exhaust from the entrance. It was explained at the time of the inspection that, due to a leak in the building roof, several of the tiles were removed and were never replaced. Physical changes to the booth after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Per PTIO P0103990, term C.2.d)(4), any time a physical change is made to the emissions unit that may affect the operation of or emission from the unit an evaluation must be performed to determine whether or not the "Air Toxics Policy" is satisfied. If the "Air Toxics Policy" was satisfied, records from the evaluation are required to be kept, per term C.2.d)(5).

If such an evaluation was performed, please submit the required records identified in term (2)d)(5) of PTIO P0103990 by November 30, 2010. If no such evaluation was performed this is a violation of PTIO P0103990, term C.2.d)(4), and it is recommended that the missing section of the booth ceiling be replaced immediately. In that case the booth must should maintained in its designed condition at all times in the future, unless the required evaluation is performed. Also, if no such evaluation was performed, please provide the date that the old ceiling tiles were removed and the date that new ceiling tiles are installed, by November 30, 2010.

3. Per PTIO P0103990, term (2)e)(2), the company is required to submit quarterly deviation reports which identify any exceedances of the rolling, 12-month individual HAP and combined HAPs emissions limitations of 9.9 tons and 24.9 tons, respectively. Ohio EPA has not received any such reports since the issuance of PTIO P0103990. Failure to submit the required reports is a violation of the terms and conditions of PTIO P0103990 and ORC 3704.05. To remedy this situation the company must submit all reports required in PTIO P0103990, term C.2.e)(2), based on the accurate records kept as required in item #1, above, beginning with the next calendar date identified in term C.2.e)(2).
4. A second paint spray booth was installed approximately two years ago. The booth is an automated, conveyORIZED line which sits next to the booth installed under PTIO P0103990. Ductwork from the new booth is tied, via a truncated duct, into the existing booth and has no forced air ventilation, relying on the draw from the primary booth exhaust to pull overspray from the second booth.

Failure to obtain a PTIO prior to installation of a new source is a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A) and ORC 3704.05. To remedy this situation the company must submit complete PTIO applications to this office for the unit in question no later than January 14, 2010.

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The company's written response to this letter is required by December 27, 2010. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situation and prevent this, or any similar such situation, from occurring in the future.

Please note that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling (419) 373-3137, or via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/lb

pc: ~~Thomas C. Cikotte, DAPC - NWDO~~

ec: William MacDowell, U.S. EPA Region V
Tom Kalman, DAPC - CO
Mark Budge, DAPC - NWDO
Jennifer Jolliff, DAPC - NWDO
E. Jay Murphy, DAPC - NWDO
Ron Nabors, OCAPP - NWDO