



Environmental
Protection Agency

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

Re: Richland County
Kronis Coatings
Premise # 03.70.01.0179
Notice of Violation (NOV)

October 19, 2011

CERTIFIED MAIL

Mr. Allen Wheeler, EH&S Director
Kronis Coatings
1575 West Longview Avenue
Mansfield, Ohio 44906

Dear Mr. Wheeler:

This letter shall serve as follow-up to the inspection conducted on September 27, 2011, of Kronis Coatings (Kronis), located at 1575 West Longview Avenue in Mansfield, Ohio, by this writer. Recent attempts to process Ohio Permit to Install and Operate (PTIO) applications revealed some conflicting information regarding what units were on site and in operation at this time. The purpose of this inspection was to identify and determine the compliance status of all air contaminant emissions units subject to regulation by the Division of Air Pollution Control (DAPC) located at the facility.

Based on my discussions, my observations during the inspection and a review of the company's files, my findings are discussed below.

1. Kronis operates two aqueous solution parts washing systems which both vent to the exterior atmosphere. One is a line consisting of multiple vertical tanks which use various acidic, caustic and clean rinse stations to clean parts. The other is a horizontal mesh belt line which conveys parts through multiple spray wash stations. Neither of these units are subject to DAPC regulation.
2. Kronis operates a natural gas fired fluidized bed parts cleaning system which is identified as P001. Kronis began installation in April of 1995 and began operation in October of 1995. Ohio Permit-to-Install (PTI) 03-9296 was issued final on November 8, 1995, for this unit and it was put on Registration Status on August 10, 2001. The PTI application for this unit describes the unit at 0.62 MM Btu/hr, however, recent inquiry shows the unit can operate at a rating as high as 0.99 MM Btu/hr. Because of the range of operational output, this unit may require a permit modification.

3. Kronis operates a 2.75MM Btu natural gas fired parts drying oven which is exempt, per Ohio Administrative Code (OAC) rule 3745-31-03(A)(1)(c).
4. Kronis operates a total of three powder coating lines which all vent inside the building after employing dry filtration; one unit is a manual application only station and the other two units use both automated and manual application stations. These units are not subject to DAPC regulation because they do not exhaust to the external atmosphere and there are no fugitive emissions.
5. Kronis operates a powder coating cure oven which uses two heating units, rated at 2.75 MM Btu/hr each. Using AP-42 emissions factors for the natural gas combustion and manufacturer's data for the powder coating operations, this unit has been determined to be meet the "de minimis" exemption in OAC rule 3745-15-05(B). However, emissions from this unit may still need to be considered for facility wide potential and actual emissions, as described later in this letter.
6. Kronis operates four (4) natural gas fired electrical co-generation units to supplement power during peak electric usage times throughout the year. Information on each unit is listed below:
 - a) Co-Generator #1, P002, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in April of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection.
 - b) Co-Generator #2, P003, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in April of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection
 - c) Co-Generator #3, P004, is permitted as a 13.05 MM Btu/hr natural gas fired unit in PTI 03-13510, issued February 6, 2001. The unit was installed in May of 2000. We were unable to confirm the heat rating, in Btus, at the time of the inspection
 - d) Co-Generator #4 was installed in July of 2007. This unit was not permitted prior to installation and remains unpermitted. We were unable to confirm the heat rating, in Btus, at the time of the inspection

Failure to obtain a PTI prior to installation and/or operation of co-generator #4 is a violation of OAC rule 3745-31-02(A) and Ohio Revised Code (ORC) 3704.05. To remedy this situation the company must submit a complete PTIO application to this office for the emissions unit in question, in conjunction with the directions identified later in this letter.

Mr. Allen Wheeler, EH&S Director

October 19, 2011

Page 3

7. Kronis operates two (2) natural gas fired boilers, each rated at 4.5 MM Btu/hr, Both were installed in April of 2000 and are exempt per OAC rule 3745-31-03(A)(1)(a).
8. According to Ohio EPA's records, there was also an emission unit identified as N001 which was listed as a burn off oven, used to remove powder coatings. PTI #03-9927 was issued on October 17, 1996 for this unit. This was overlooked at the time of the inspection and, Ohio EPA needs to confirm the unit is still on site and in operation. Please indicate in your response to this NOV whether the unit is still in operation.

An initial review of the facility's permits and emissions limits prior to inspection show that, with the installation of co-generator #4, Kronis may have exceeded Title V emissions thresholds based on their potential to emit (PTE). However, as we discussed during the inspection, Kronis does not operate the co-generators at their full capacity, typically limiting their operation to only a few hundred operational hours per year. This will impact Kronis' Title V applicability and may result in Kronis qualifying for a synthetic minor federally enforceable state operating permit (FESOP). To accurately make that determination Ohio EPA is requesting that Kronis submit facility wide PTE calculations and facility wide actual emissions calculations for all regulated emissions units on site. This would include all emissions units previously identified as exempted by rule and those that are believed to be "de minimis". All regulated pollutants must be examined as this will help determine if the facility qualifies for the FESOP permit.

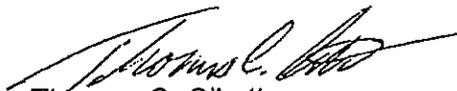
Once a determination is made as to which units require permitting or possible modifications, Ohio EPA will advise Kronis how to proceed with the permit application process. The company's written response to this letter is requested no later than November 25, 2011. It should be submitted to Ohio EPA, Northwest District Office and contain the above referenced calculations and 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.

Mr. Allen Wheeler, EH&S Director
October 19, 2011
Page 4

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

/l/r

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

Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Michael Byrne Manufacturing

Input is 27 characters long.

Date:



2/24/2009

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Michael Byrne Manufacturing
Premise#: Not yet assigned
Notice of Violation

February 24, 2009

CERTIFIED MAIL

Mr. Jim Weist, President
Michael Byrne Manufacturing
1855 Earthboring Road
P.O. Box 444
Mansfield, Ohio 44901

Dear Mr. Weist:

This letter shall serve as follow-up to the inspection conducted on February 17, 2009, of Michael Byrne Manufacturing (MBM) by Mr. Chad Winebrenner and myself. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. The natural gas fired cutting table is a possible source of emissions and more information is needed to make that determination. Please provide the following information for that operation: Year the cutting table was installed; make and model number of the cutting table; heat rating of the cutting torch (in Btu/hr); maximum thickness of material cut on the table, and; the number of hours the table is used per day.

Also, Ohio EPA would like to observe this equipment in operation. Please contact me so that a time can be arranged for Ohio EPA to be on site.

2. A paint booth is on site that has been acknowledged in past correspondence from Ohio EPA to MBM, dating back to 1996. No follow-up by either Ohio EPA or MBM was done. Regardless, installation of this coating operation without first obtaining a permit to install or a permit to operate is a violation of Ohio Administrative Code (OAC) rules 3745-31-02(A), 3745-35-02 and Ohio Revised Code (ORC) 3704.05.

Mr. Jim Weist, President

February 24, 2009

Page 2

The company's written response to this letter is requested by March 27, 2009. 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. The response should also include complete PTIO applications, including all applicable emissions activity category (EAC) forms, emissions calculations and process flow diagrams.

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.

As discussed at the time of our visit, our agency's Office of Compliance Assistance and Pollution Prevention (OCAPP) is available to any qualifying small business to assist in achieving and maintaining compliance with Ohio's environmental regulatory programs. More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html> Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Ron Nabors at (419) 373-3147. Also, should you contact OCAPP for assistance, please inform our office of that so that a new deadline for application submission can be determined.

Thank you, again, for accommodating our unannounced visit on the 17th. 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 electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

//lr

pc: Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC - CO
Don Waltermeyer, DAPC - NWDO
Thomas C. Cikotte, DAPC - NWDO
Kara Reynolds, DHWM - NWDO

PHASE 0 AD-HOC BARCODE SHEET

11/15/2011 8:50 AM

Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Michael Byrne Manufacturing

Input is 27 characters long.

Date:



3/12/2011

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Richland County
Michael Byrne Manufacturing
Premise#: Not assigned
Return to Compliance

March 12, 2010

CERTIFIED MAIL

Mr. Jim Weist - President
Michael Byrne Manufacturing
1855 Earthboring Road
P.O. Box 444
Mansfield, Ohio 44901

Dear Mr. Weist:

Ohio EPA is in receipt of your letter, dated March 3, 2010, which is the response to the notice of violation sent to Michael Byrne Manufacturing on February 24, 2009. At this time, all emissions units appear to be in compliance with the air pollution control emission limitations and regulations of Ohio EPA.

Please be aware that daily recordkeeping must be maintained to be eligible for the "de minimis" exemption to be applied and that if the exemptions thresholds are exceeded the facility will be required to complete the permitting process for that unit.

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 electronically 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~~
7006 0100 0004 1318 4092

ec: Thomas C. Cikotte, DAPC - NWDO
Kara Reynolds, DHWM - NWDO



PHASE 0 AD-HOC BARCODE SHEET

11/15/2011 9:02 AM

Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Lexington Concrete

Input is 18 characters long.

Date:



10/5/2009

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Lexington Concrete
Premise#: Not yet assigned
Notice of Violation

CERTIFIED MAIL
7009 0820 0000 0591 9846

October 5, 2009

Mr. Marty Moritz
Moritz Concrete
P.O. Box 1342
Mansfield, Ohio 44901

Dear Mr. Moritz:

This letter shall serve as follow-up to the inspection conducted on September 29, 2009, by Carol Norman and myself, of Lexington Concrete, at 230 South Mill Street in Lexington. The purpose of this inspection was to investigate an anonymous complaint, and to determine the compliance status of all air contaminant emissions units located there.

Based on our discussion, and our observations during the inspection, findings are as follows:

1. Facility conditions made it impossible to determine the validity of the complaint. There was a light rain falling, and no dust was observed. The plant was not in operation at the time of inspection. It is difficult to infer from this inspection what facility conditions would be under full operations on a hot, dry day. This complaint will remain open and additional inspections will be necessary.
2. This facility was installed by the previous owner in May 2007. Moritz Concrete purchased the facility in May 2008. The Division of Air Pollution Control has no record of an application for a permit to install and/or operate being submitted for the concrete batch plant, roadways and storage piles at this facility. Installation of this facility without first obtaining a permit to install or a permit to operate is a violation of Ohio Administrative Code (OAC) rules 3745-31-02(A), 3745-35-02 and Ohio Revised Code (ORC) 3704.05.

Mr. Marty Moritz
October 5, 2009
Page 2

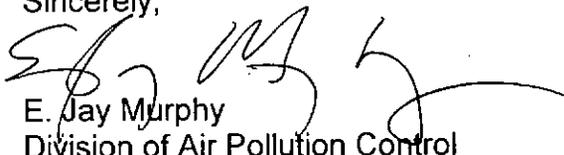
3. A written response to this letter is requested by November 13, 2009. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to prevent and/or remedy any potential dust emissions at the facility resulting from plant operations. The response should also include complete PTIO applications, including all applicable emissions activity category (EAC) forms, emissions calculations and process flow diagrams for the batch plant, paved and unpaved roadways and storage piles.
4. There are General Permits for concrete batch plants, roadways and storage piles. Please review these documents by going to <http://www.epa.ohio.gov/dapc/genpermit/genpermits> for instructions on submitting materials for these permits.

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.

Our agency's Office of Compliance Assistance and Pollution Prevention (OCAPP) is available to any qualifying small business to assist in achieving and maintaining compliance with Ohio's environmental regulatory programs. More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Ron Nabors at (419) 373-3147. Also, should you contact OCAPP for assistance, please inform our office so that a new deadline for application submission can be determined.

Thank you, again, for accommodating our unannounced visit on the 29th. If the company has any questions and/or comments concerning this letter, please contact me at the above address, by calling 419.373.3069, or electronically at elizabeth.murphy@epa.state.oh.us.

Sincerely,



E. Jay Murphy
Division of Air Pollution Control

/csl

pc: Andy Stehle, Lexington Concrete
Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC - CO
Don Waltermeyer, DAPC - NWDO
Facility File, DAPC - NWDO

U.S. Postal Service™
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MR MARTY MORITZ

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Postage & Certified Fee	2.30
Restricted Delivery Fee	
Total Postage & Fees	\$ 2.54

Postmark
Here

DAPC/EJ Murph

MORITZ CONCRETE

PO BOX 1342
 MANSFIELD OH 44901

PS Form 3800, August 2006

See Reverse for Instructions

9496 6650 0000 0591 9846
 7009 0820 0000 0591 9846

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR MARTY MORITZ
 MORITZ CONCRETE
 PO BOX 1342
 MANSFIELD OH 44901

DAPC/EJ Murphy/esl

2. Article Number
(Transfer from service label)

7009 0820 0000 0591 9846

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

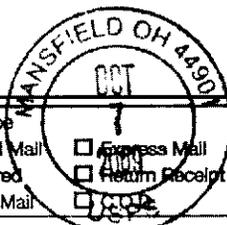
A. Signature
 X *Martin Moritz* Agent Addressee

B. Received by (Printed Name) *Martin Moritz* Date of Delivery

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail Signature Required

4. Restricted Delivery? (Extra Fee) Yes





Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Hot Rodz and Hooptys

Input is 20 characters long.

Date:



3/11/2010

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Richland County
Hot Rodz & Hooptys

Notice of Violation (NOV)

March 11, 2010

CERTIFIED MAIL

Ryan McKenna, Owner
Hot Rodz & Hooptys
408 Henry Street
Mansfield, Ohio 44907

Dear Mr. McKenna:

This letter shall serve as follow-up to the inspection conducted on March 9, 2010, of the above-referenced business, doing business at Paone's Quality used Cars, 3120 Park Ave. West, Mansfield, Ohio, 44906, by this writer. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

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

1. Hot Rodz & Hooptys (HRH) is a business advertising autobody refinishing & restoration services. HRH operates out of the property owned by David P. Paone and the building is signed as Paone's Quality Used Cars. Mr. Paone had used the building in the past for "touch-up work" on vehicles he owned and intended to sell but stopped that practice before HRH started to use the building. Mr. Paone still operates the used vehicle sales portion of his business on the property. HRH has been doing business at this location for approximately 6 months.
2. An enclosure with powered ventilation is used as a paint booth to the far west end of the building. The booth has a horizontal discharge which is less than 60' to the nearest property line. The booth does not meet the qualifying criteria for Permit-By-Rule. Daily records have not been kept to show coating or clean-up material usage, therefore, the company cannot currently show that it qualifies for the "de minimis" exemption in Ohio Administrative Code (OAC) 3745-15-05.
3. HRH has installed and/or operated an air contaminant source without first obtaining a Permit-to-Install/Operate (PTIO). This is a violation of Ohio Administrative Code (OAC) rules 3745-31-02(A) and Ohio Revised Code (ORC) 3704.05.



Mr. Ryan McKenna
March 11, 2010
Page Two

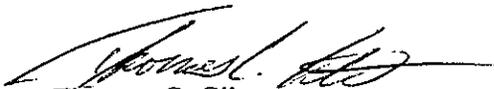
As discussed at the time of our visit, your operation may, meet the criteria for the "de minimis" exemption. Our agency's Office of Compliance Assistance and Pollution Prevention (OCAPP) is available to any qualifying small business to assist in achieving and maintaining compliance with Ohio's environmental regulatory programs and they would be able to help you with that determination and/or the permitting process. More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Ron Nabors at (419) 373-3147. Also, should you contact OCAPP for assistance, please inform me of that as soon as possible so that a new deadline for application submission can be determined.

The company's written response to this letter is requested by April 9, 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. The response should also include complete PTIO applications, including all applicable emissions activity category (EAC) forms, emissions calculations and process flow diagrams.

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 electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,


Thomas C. Cikotte
Division of Air Pollution Control

/lb

pc: Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC - CO
Don Waltermeyer, DAPC - NWDO
~~Thomas C. Cikotte, DAPC - NWDO~~

Department:


DAPC

Subdepartment:


<NONE>

Office Location:


NWDO

Media:


AIR

Doc Type:


NOV

Doc Subtype:


DAPC-Permit

Program:


<NONE>

County:


70 - RICHLAND

Facility ID



Facility Name:


Custom Hardwoods

Input is 16 characters long.

Date:


6/22/2007

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Custom Hardwoods
4280 Hinesville Road
Shelby, Ohio 44875
Unpermitted facility
Notice of Violation

June 22, 2007

CERTIFIED MAIL

Mr. Chris Fraley
Custom Hardwoods
2250 State Route 39
Mansfield, Ohio 44903-8009

Dear Mr. Fraley:

This letter shall serve as follow-up to the inspection conducted at the above-referenced facility on June 14, 2007, by Mr. Mohammad Smidi, Mr. Chad Winebrenner and myself from the Northwest District Office (NWDO). The reason for the inspection was to determine the compliance status of the emissions unit operating at the facility with the rules and regulations of the Division of Air Pollution Control (DAPC). We appreciate your cooperation during the unannounced inspection on June 14th.

Findings of this inspection and related information can be summarized as follows:

1. The facility has existed at this location for approximately four years. The facility has operated at least one unpermitted coating operation during this time. The facility has maintained the operation is "de minimis" and only employs one type of primer with two additional tinting options and acetone for thinning and clean-up.

The facility has also repeatedly announced its intention to relocate to 220 Mansfield Industrial Parkway, Mansfield, OH. Mr. Chad Delbecq of NWDO - DAPC, Mr. Ron Nabors of Ohio EPA's Office of Compliance and Pollution Prevention (OCAPP), Mr. Mohammad Smidi of NWDO - DAPC and myself have all been informed of this on numerous occasions, the first of which was approximately 18 months ago. Each time the issue has been discussed, the expected date for this event has been extended.

2. Several complaints have been received by NWDO and subsequent investigations have resulted in the following allegations: open burning; burning materials other than clean; dry wood in an outdoor wood burning heating unit; problems with nuisance dust, and; odor problems described as a chronic chemical solvent odor.
3. I visited the facility on May 14, 2007, in response to a complaint. Evidence of past open burning was found, however, it did not appear that any open burning had occurred recently. Coated wood scraps that are not permitted to be burned were found in a pile near the outdoor wood burning heating unit and the facility was informed that they could not burn coated wood scraps in the heater. The facility was also advised that it needed to be more diligent in their handling of the dust from woodworking operations on site. In response to the original complaint, no objectionable odors were detected at the time of the visit. A letter was issued on May 25, 2007, reiterating these requirements.
4. On the June 14, 2007, inspection, it was determined the facility employs more than seven different coatings and two different thinning solvents/clean-up materials. The facility keeps insufficient documentation to support being a "de minimis" coating operation and regularly exceeds the maximum emissions levels allowed in the "de minimis" rules found in Ohio Administrative Code (OAC) rule 3745-15-05. Therefore, the facility is in violation of not having obtained a Permit to Install (PTI) and a Permit to Operate (PTO) prior to installation and operation of this emissions unit pursuant to OAC rules 3745-31-02 and OAC 3745-35-02 as well as ORC 3704.05.

The facility is required to apply for a PTI and PTO (and submit corresponding Emissions Activity Category form) by submitting the respective applications. These applications can be found at found on Ohio EPA's website at <http://www.epa.state.oh.us/dapc/fops/eac/eacforms.html>. They must be submitted to NWDO by July 23, 2007, or the facility must cease operation of all coating operations.

5. Wood with primer applied was found in the outdoor wood burning heating unit, however, the unit was not in operation. This shall serve as the final warning regarding this matter. If wood, aside from clean, dry wood, burned in the outdoor wood burning unit again, the facility will be found in violation of the rules and regulations of the DAPC and will be required to obtain a permit accordingly.
6. The nuisance investigations are ongoing and a determination on the facility's compliance with OAC rule 3745-15-07 will be made at a later date.

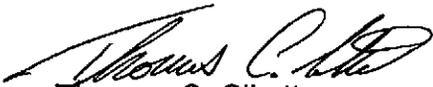
Mr. Chris Fraley
June 22, 2007
Page 3

A written response indicating the facility's intention should be submitted to my attention no later than July 13, 2007. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06.

The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns, please contact me at (419) 373-3137.

Sincerely,



Thomas C. Cikotte
Environmental Specialist
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Elisa Thomas, DAPC-CO
Lisa Holscher, US EPA Region 5
Samir Araj, DAPC-NWDO
Tom Kalman, DAPC-NWDO
Thomas C. Cikotte, DAPC-NWDO
Phyllis Alt



PHASE 0 AD-HOC BARCODE SHEET

11/15/2011 9:04 AM

Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Custom Hardwoods

Input is 16 characters long.

Date:



5/25/2007

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Custom Hardwoods
4280 Hinesville Rd.
Shelby, Ohio 44875
Warning Letter

May 25, 2007

Mr. Chris Fraley
Custom Hardwoods
4280 Hinesville Rd.
Shelby, Ohio 44875

Dear Mr. Fraley:

This letter shall serve as follow-up to the complaint investigation conducted on May 17, 2007 at the above referenced facility. A complaint was received on May 14, 2005 by the Ohio Environmental Protection Agency's Northwest District Office (NWDO), Division of Air Pollution Control (DAPC) alleging that a strong chemical odor was coming from the business. Upon speaking to the complainant, other complaints of suspected open burning, improper burning in an outdoor wood fired heating unit and nuisance dust were also brought to our attention. Regarding the most recent complaint, our findings are as follows:

1. Chemical Odor:

The facility was sent a Notice of Violation (NOV), on July 19, 2006, for failure to obtain proper permits for its coating operations. Since then, it has taken the appropriate steps to come into compliance with the Ohio air pollution laws and rules regarding the permitting of coating operations. The coating operations have been confined to one location on the premises and a partial, "temporary" enclosure has been constructed.

The facility has limited coating operations to 2.0 gallons of coating per day to meet the de minimis standard under OAC rule 3745-15-05 and has kept records accordingly. The partial enclosure has been fitted with a dry filtration system to control particulate emissions, however, horizontal discharge from the side of the building continues. Although the coating operations are exempt from our regulations, we recommend the company vent emissions through a vertical stack above the roof to better disperse emissions.

2. **Open burning:**
The complainant described two locations where open burning allegedly occurred. Upon inspection, the described location to the east of the property appears to have been burned on but not in recent times. Barrels that were on site, located next to the wood burning heating unit, appear to contain ash that was removed from the stove. It does not appear that these barrels were used for burning as all factory labels and paint were intact and no sign of heat related discoloration was apparent. There was no evidence to substantiate this allegation.

3. **Improper burning in an outdoor wood fired heating unit:**
The complainant described a thick black smoke that was not only a nuisance but also obscured traffic on a nearby highway, endangering public safety. The NOV dated 7/19/06 it was clearly stated that this outdoor wood fired heating unit may not be used to burn "Waste Fuel" and that only clean, dry wood may be burned. Custom Hardwoods was encouraged to take whatever steps necessary to minimize the release of smoke as a result of the operation of this unit.

While on site; I saw several pieces of scrap wood from the woodworking operations that had been coated with primer from the facility's coating operations in a pile with wood that was to be burned in the unit. The unit was not in operation at the time of my visit, however, it is suspected that it has been used to burn materials other than clean, dry wood which would void its exemption of OAC Rule 3745-31-03(A)(1)(b). This letter shall serve as the final warning on this matter.

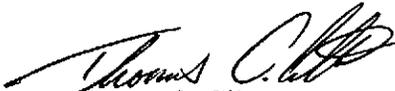
4. **Nuisance Dust**
The complainant described large volumes of saw dust blowing onto their property from the facility. Two main sources of dust were described; unloading of the dust system bags into the facility's trash dumpster and unloading of the dumpster into an open-top refuse vehicle. Dust control from woodworking operations is currently being done via several small vacuum units that are located near the machines being controlled. Dust is collected into bags and the bags are emptied into a dumpster. When the dumpster is collected, it is lifted over the vehicle and loaded into the vehicle's compactor. It is recommended that the facility take all practical measures to reduce and control the nuisance dust generated from these operations. Failure to do so will result in a public nuisance determination by the DAPC.

Mr. Chris Fraley
May 25, 2007
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In communication with this office, Custom Hardwoods has described it's intention to relocate to Mansfield. A date of June 1, 2007 was initially given, by which point the facility will have completed relocation. Upon my visit, I was told that 6-8 additional weeks would be needed from May 17, 2007. The company indicated it would contact me in four weeks and give me a status update as to the facility's relocation. This should occur on or about June 14, 2007.

If you have any questions or comments regarding this matter, please feel free to contact me at (419) 373-3137 or thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Environmental Specialist II
Division of Air Pollution Control

/csl

cc: Don Waltermeyer, DAPC, NWDO
Tom Sattler, DAPC, NWDO
'NWDO Richland County General File'



PHASE 0 AD-HOC BARCODE SHEET

11/15/2011 9:05 AM

Department:



DAPC

Subdepartment:



<NONE>

Office Location:



NWDO

Media:



AIR

Doc Type:



NOV

Doc Subtype:



DAPC-Permit

Program:



<NONE>

County:



70 - RICHLAND

Facility ID



Facility Name:



Clean Water Ltd.

Input is 16 characters long.

Date:



10/9/2011

Record ID:





State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Richland County
Clean Water Ltd.

Notice of Violation (NOV)

October 9, 2009

CERTIFIED MAIL
7009 0820 0000 0591 9808

John Staton
Vice President of Regulatory Affairs
300 Cherokee Drive
Mansfield, Ohio 45427

Dear Mr. Staton:

This letter shall serve as follow-up to the inspection conducted on October 6, 2009 of the Clean Water Ltd (CWL) facility located at 81 Knights Pkwy in Mansfield, Ohio. The purpose of this inspection was to respond to several complaints this agency received regarding odors in the area of that facility.

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

- An odor was identified and verified by multiple complainants on October 6th, 2009. Based on the location of the facility and the wind direction at the time, the source of odor was determined to be the CWL facility identified above. The facility was determined to be operating sources of air contaminant emissions that are causing a public nuisance. The emissions of odors in such a manner as to cause a public nuisance is a violation of Ohio Administrative Code (OAC) 3754-15-07(A).

The company's written response to this letter is requested by October 30, 2009. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situation and prevent any similar such situation from occurring in the future. Also, as indicated in the phone conversation between you, Mr. Don Waltermeyer and I on October 8, 2009, there are several issues that Ohio EPA would like CWL to respond to. These items are identified below and their responses should be included with the company's response requested above.

1. Please describe the treatment process from the time that a full tanker arrives to the time that the end products are considered disposed of. A process flow diagram would also be useful.

2. Please identify all possible emissions points at the plant. Five stacks were observed penetrating the roof at the facility and it was unable to be determined if there were any vents inside the building or any sources of fugitive emissions. When identifying point sources, please include any of the following pieces of information which are applicable: emissions point source; facility ID name/number; stack shape; stack size; process flow rate, in actual cubic feet per minute (acfm).
3. Please provide the heat input rating for the facility boiler, in mmBtu/hr.
4. Please provide a description of the facility's process heater, including the heat input rating, in mmBtu/hr.
5. Please describe the waste profiling process and lab procedures conducted at the company's main laboratory in Dayton, Ohio.
6. Please describe the waste profiling process and lab procedures conducted at the Mansfield, Ohio facility.
7. Please describe the process used for testing incoming wastes for compatibility with wastes already in the treatment system.
8. Is a vapor balance or vapor control system in place for the post treatment waste storage tanks or are the tanks vented? If the tanks are vented, are these vents passive or active? If active, please provide a flow rate, in acfm.
9. Please provide a description of the typical types of waste streams accepted by the facility.
10. Please describe the criteria used to accept or deny a waste load delivered to the facility.
11. Have any systemic changes, either equipment based or operational procedure based, occurred in the last 6 weeks that would increase the likelihood of the release of objectionable odors?
12. Does CWL - Mansfield, have, or has the company recently acquired, any customers that have a waste stream with a particularly objectionable odor? If so, please identify those companies and the waste streams which are accepted from those companies.
13. Does CWL - Mansfield accept waste from Heartland Petroleum, Gabriel Performance or Clean Harbors? If so, please identify the company and the respective waste streams which are accepted.
14. Does CWL - Mansfield accept any waste streams that contain, or would produce as a byproduct of processing, di-methyl sulfur oxide (CAS No: 9008-97-3)?
15. Does CWL - Mansfield have any procedures to test for or identify the presence of odors emanating from the facility?

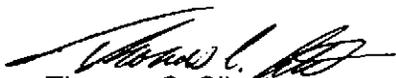
Mr. John Staton
October 9, 2009
Page 3

16. Does CWL – Mansfield have any procedures to test for or identify possible biological contaminations, such as bacteriological or fungal, which may produce objectionable odors?

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 electronically via e-mail at thomas.cikotte@epa.state.oh.us.

Sincerely,



Thomas C. Cikotte
Division of Air Pollution Control

/csl

pc: Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC - CO
Thomas C. Cikotte, DAPC – NWDO
Richland County Health Department

ec: Don Waltermeyer, DAPC - NWDO
Luke Mountjoy, DAPC - CDO