



**Environmental  
Protection Agency**

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

Re: Sandusky County  
Meggitt Sandblasting & Painting  
5625 State Route 412  
Vickery, OH 43464  
Complaint Investigation  
Notice of Violation

August 12, 2010

**CERTIFIED MAIL**

Mr. Bruce Meggitt, Owner  
Meggitt Sandblasting & Painting  
5625 State Route 412  
Vickery, Ohio 43464

Dear Mr. Meggitt:

This letter shall serve as follow-up to the complaint investigation conducted at the above-referenced facility on August 10, 2010. The reason for the investigation was to determine the veracity of the complaint. It is my understanding from talking to you that this facility has been in operation for about thirty years, sandblasting and painting vehicles.

After having witnessed the operations located at this site in relation to the rules and regulation of the Division of Air Pollution Control (DAPC), the following conclusions have been drawn:

1. Meggitt Sandblasting & Painting (herein referred to as MS&P) is operating three separate bay sections used for painting. These emission units were installed and operated without submitting applications and obtaining the requisite permits in accordance with Ohio Administrative Code (OAC) rule 3745-31-02. Therefore, MS&P is in violation of that rule and Ohio Revised Code (ORC) section 3704.05.
2. MS&P is operating a sandblasting area. This emissions unit was installed and operated prior to submitting applications and obtaining the requisite permits in accordance with OAC rule 3745-31-02. Therefore, MS&P is in violation of that rule and ORC 3704.05.
3. As designed and operated, MS&P is in violation of OAC rules 3745-17-07 Control of visible particulate emissions from stationary sources and 3745-17-09 Restrictions on particulate emissions and odors from incinerators for operating the sandblasting area.

It is also a violation of OAC rule 3745-31-05 for not employing best available technology to reduce emissions of air contaminants. These rule violations constitute a violation of ORC section 3704.05.

4. The actual emissions from these operations are unknown based on the inspection. Therefore, it is necessary that MS&P submit purchase order records of coating and cleanup material that has been used in the last three years.

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5. It is unknown whether MS&P would be considered a Title V facility or not at this juncture. Regardless, the facility is in violation of not having submitted fee emission reports in accordance with OAC rule 3745-78-02 since at least 1996. MS&P is also in violation of ORC section 3745.11.
6. Permit applications, Emissions Activity Category (EAC) forms and process flow diagrams must be submitted in order for the operations at MS&P to begin to come into conformance with the rules and regulations of DAPC.
7. As discussed during the inspection, MS&P may wish to contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for assistance with this process. If interested, Mr. Ron Nabors of OCAPP can be contacted for additional information at (419) 373-3147 or ron.nabors@epa.ohio.gov.

Please submit the required information indicated above by no later than September 24, 2010. 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 you have any questions and/or comments about this letter, feel free to contact me electronically at mohammad.smidi@epa.ohio.gov or call me at (419) 373-3118.

Respectfully,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control

/llr

pc: Lisa Holscher, US EPA Region V  
Mark Budge, DAPC-NWDO  
Tom Kalman, DAPC-CO  
~~DAPC-NWDO General Sandusky County File~~  
Certified Receipt Number 70098 1680 0002 4297 3336

ec: Brian Riedmaier, DAPC-NWDO  
Melanie Ray, DAPC-NWDO  
Ron Nabors, DAPC-NWDO