



**Environmental
Protection Agency**

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

Re: Van Wert County
Elgin Service Center
Premise # TBD
Notice of Violation (NOV/non HPV)

July 25, 2012

CERTIFIED MAIL

Mr. Scott Klausing
Elgin Service Center
18018 State Route 81
Elgin, Ohio 45838

Dear Mr. Klausing:

This letter shall serve as follow-up to the complaint investigation conducted on July 2, 2012, of Elgin Service Center. Ms. Wendy Miller, Division of Material and Waste Management, and Ms. Carol Norman, Division of Air Pollution Control (DAPC), were present from Ohio EPA. Mr. Dan Klausing represented the facility during the site visit. The purpose of the site visit was to investigate potential air and hazardous waste violations as described to our office by a complaint we received, and to conduct an investigation of all air contaminant emissions units located at Elgin Service Center (ESC) to determine compliance with the rules and regulations of DAPC.

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

1. A large, open vessel located at the rear of the property is used by ESC to burn some of the facility's waste. This is defined as "open burning" in Ohio Administrative Code (OAC) rule 3745-19-01(I). A business cannot "open burn" its waste in Ohio, even if it is office paper waste. Burning such waste is a violation of OAC rule 3745-19-03(A) and Ohio Revised Code (ORC) 3704.05 and should be stopped immediately. If ESC needs assistance in finding alternative methods of disposal of their business waste the Ohio EPA is willing to assist ESC in this endeavor.
2. Mr. Dan Klausing stated during the inspection that he takes used paint filters and spent xylene to his farm in Meigs/Gallia Counties to dispose of by open burning. This too, is an unacceptable method of waste disposal and would be a violation of OAC rule 3745-19-04(A) and ORC 3704.05 and should be stopped immediately.

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3. ESC had no electric power on the day of the inspection, July 2, 2012. Three days prior, on Friday, June 29, a severe storm knocked out electricity to much of the area. The facility was using an emergency generator rated at 4000 watts (5.4 horsepower) as a power source. This generator is sometimes used at jobsites when the client is unable to supply power to the site. The generator is typically used 40 hours per year. An emergency generator of this size (rated at 5.4 hp) is exempt from permitting requirements per OAC 3745-31-03 (A)(1)(nn). Therefore, no action is needed on the company's part.
4. ESC paints steel components at its facility. The painting is performed in a large booth that has three filters which exhaust to the atmosphere. The painting operation is a source of volatile organic matter (VOC) and may be subject to regulation under OAC 3745-21. Please provide data showing the quantities of all paints used in a year, and the highest amount of painting that could be performed in any one day. Also needed are calculations showing the hourly, daily, and annual potential to emit for VOC's from all paints used in the painting operation. In addition, please provide the Material Safety Data Sheets (MSDS) for each of the paints used.

Xylene is used as a cleanup solvent in the painting operation. Please provide calculations showing daily and yearly usage rates of the xylene, and of any other cleanup materials used in the painting operation. Also, please provide Material Safety Data Sheets (MSDS) for each of the materials used in cleanup activities.

Upon receipt of this information, DAPC will determine whether or not a Permit to Install and Operate (PTIO) is required for the painting operation.

5. ESC operates a corn burner for building heat. Please provide the British Thermal Unit (BTU) rating for this unit. Based on the size of the unit and its emissions, a determination will be made as to whether or not a PTIO is required for the burner.

As discussed during the inspection, Ohio EPA has an Office of Compliance Assistance and Pollution Prevention (OCAPP) that is available to assist qualifying small businesses in achieving and maintaining compliance with Ohio's environmental regulatory programs. OCAPP will be able to help you with the permit requirement determination and the permitting process. More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. The contact person for OCAPP is Mr. Ron Nabors, his phone number is (419) 373-3147. He can lend assistance with issues pertaining to this letter. If you decide to contact OCAPP for assistance, please inform me of that as soon as possible so that a new deadline for information submission can be established, if needed.

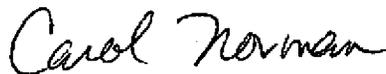
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The company's written response to this letter is requested by August 20, 2012. The response should be submitted to Ohio EPA, Northwest District Office and contain the information requested in this letter.

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) 373-3141, or via e-mail at carol.norman@epa.state.oh.us.

Sincerely,



Carol Norman, PhD, PE
Division of Air Pollution Control

/cg

pc: File, DAPC NWDO, Van Wert County, Elgin Service Center
Certified Mail Receipt Number 70091410000118346052

ec: Tom Kalman, DAPC CO
Mark Budge, DAPC NWDO
Jennifer Jolliff, DAPC NWDO
Wendy Miller, DMWM NWDO
Justin Williams, DSW NWDO
Carol Norman, DAPC NWDO