Ohio EPA
40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Defiance County
Yoder Body Shop
Notice of Violation (NOV/non-HPV)

February 1, 2013

Certified Mail

Mr. Ben Peffley, Owner
Yoder Body Shop
703 West High Street
Hicksville, Ohio 43526

Dear Mr. Peffley:

This letter shall serve as a follow-up to the site visit on January 30, 2013 of Yoder Body Shop by Mr. Chad Winebrenner and myself from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO).

Based on discussions with employees and observations during the investigation, our findings are as follows:

(1) Yoder Body Shop operates three conjoining spray booths. All three booths employ a side draft where emissions are exhausted out the side of the facility. Filters are installed in each of the spray booths and coatings are applied with high pressure low volume (HPLV) spray guns.

(2) Entire cars are painted and minor touch-ups are performed in all of the booths. Clear coating, primer and topcoat are employed in these spray booths. Solvents are used as cleanup material.

(3) Based on the information provided, Yoder Body Shop is required to submit a completed permit-to-install and operate (PTIO) application and emissions activity category (EAC) form for surface coating operations for each of the three paint booths. Electronic PTIO and EAC forms are available on Ohio EPA's website at http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx. Please include the maximum hourly coating usage, emissions calculations, a process flow diagram and equipment installation and/or replacement dates to aid the processing of the application.

Additional sources of information which may assist you with answering some of the questions above, commonly referred to as "engineering guides", can be found on Ohio EPA's website at http://epa.ohio.gov/dapc/engineer/eguides.aspx. Specifically, guide numbers 45 & 48 may prove helpful to you.

As discussed during the inspection, Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is also 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. Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Ron Nabors, at (419) 373-3147. 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 determined, if needed.

Finally, as a courtesy reminder, the new Federal NESHAP rule HHHHHH, for Paint Stripping and Miscellaneous Surface Coating Operations, became effective March 2011. If you have questions regarding this new requirement, please contact Ron Nabors.

The company's written response to this letter is requested by March 4, 2013. The response should contain all pieces of information identified in item (3). The response should be submitted to Ohio EPA, Northwest District Office, to my attention.

Please note 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 as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address, by email at Alyse.Johnson@epa.state.oh.us or call (419) 373-3110.

Sincerely,

Alyse Johnson

Alyse Johnson
Environmental Specialist
DAPC-NWDO

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pc: Certified Mail Receipt Number 70113500000082042029

ec: Alyse Johnson, NWDO-DAPC
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Bruce Weinberg, DAPC-CO
Brian Dickens, US EPA, Region V
Ben Peffley, Yoder Body Shop