



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

Re: Richland County  
Body by Bandy  
Notice of Violation (NOV/non-HPV)

March 7, 2013

CERTIFIED MAIL

Mr. Rick Bandy  
Body by Bandy  
2892 Bowman Street Road  
Mansfield, Ohio 44903

Dear Mr. Bandy:

This letter shall serve as a follow-up to the site visit on February 28, 2013, of Body by Bandy by Ms. Alyse Johnson and myself from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO).

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

- 1) Body by Bandy operates an auto body shop and works on automobile restoration for antique, custom and miscellaneous vehicles. The shop operates one paint booth where either entire cars or repaired parts are painted. A primer, base coat and clear is applied to each part of the car that needs painted. Cleanup material is used at the shop as well. The booth is controlled by a particulate filter and air is exhausted via a louvered duct on the roof.  
In the winter, Body by Bandy does more high volume painting work on the non-custom vehicles. On average during the winter months, an entire car is painted each week with various parts from other vehicles being painted as well. The summertime sees a slowdown in painting activities due to more time involved with restoration of the custom/antique vehicles.
- 2) Body by Bandy failed to submit an application for a permit to install before installing and operating the paint booth. Failure to first obtain a PTIO prior to installation and operation of the emission source is a violation of both OAC rule 3745-31-02 and ORC 3704.05.
- 3) Due to the amount of paint being applied, Body by Bandy will be required to submit a permit-to-install and operate (PTIO) application, emissions activity category (EAC) form for surface coating operations and emissions calculations for the paint booth. Electronic PTIO and EAC forms are available on Ohio EPA's website at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.

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.

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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 April 11, 2013. The response should contain all pieces of information identified in item (2). 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 [Chad.Winebrenner@epa.state.oh.us](mailto:Chad.Winebrenner@epa.state.oh.us) or call (419) 373-3121.

Sincerely,



Chad Winebrenner  
Environmental Specialist  
DAPC-NWDO

/lir

Certified Mail Receipt Number 7009 1410 0001 1834 3174

ec: Alyse Johnson, NWDO-DAPC  
Chad Winebrenner, NWDO-DAPC  
Jennifer Jolliff, NWDO-DAPC  
Bruce Weinberg, DAPC-CO  
Brian Dickens, US EPA, Region V  
Rick Bandy