



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 726-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL # 91 7108 2133 3932 4450 5572

March 18, 2008

Mr Michael Koch
City Manager
Avis Budget Group, Port Columbus
3801 International Gateway
Columbus, OH 43219

**Re: Notice of Violation: Installation and operation of air contaminant sources
without permits required by OAC rules 3745-31-02 and 3745-35-02**

Dear Mr. Koch:

The Central District Office (CDO) has learned that Avis Budget Group has installed and has been operating air contaminant sources prior to applying for and obtaining either an air permit-to-install (PTI) and air permit-to-operate (PTO) or a permit by rule (PBR) exemption from Ohio Environmental Protection Agency (Ohio EPA). Specifically, CDO learned that Avis Budget Group installed and operated a gasoline dispensing facility without the necessary permits.

The installation and operation of any stationary air pollution source without first applying for and obtaining a PTI and PTO or a PBR permit exemption constitutes violations of OAC rules 3745-31-02 and 3745-35-02, respectively. The Ohio Administrative Code (OAC) rule 3745-31-02 (A) states that *no person shall cause, permit, or allow the installation of a new source of air pollutants...without first obtaining a PTI from the director.* OAC rule 3745-35-02(A) states that *no person may cause, permit, or allow the operation or other use of any air contaminant source without applying for and obtaining a PTO from the director.*

Please submit all necessary permit applications or exemption application within 30 days of receipt of this letter. PTI and PTO and PBR applications are enclosed. Please note that the Ohio EPA has the authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code (ORC). This letter or information pursuant to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC. The decision on whether or not to seek such penalties will be made by Ohio EPA at a later date.

If at some time in the future, Avis Budget Group plans to install/modify an air contaminant source, please contact CDO at (614) 728-3778 to obtain the appropriate forms and discuss the applicability of any rules in question. Ohio EPA will endeavor to process all applications in an expeditious manner.

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

Mr Michael Koch
Avis Budget Group, Port Columbus
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If you have any questions, please do not hesitate to contact Richard Fowler of my staff at (614) 995-0671 or the Office of Compliance Assistance and Pollution Prevention (brochure enclosed) at 1-800-329-7518.

Sincerely,



Mike Riggelman
Permits and Compliance Team Supervisor
Division of Air Pollution Control
Central District Office

Attachments: PTI application, PTO application, EAC form(s), PBR application, and
Office of Compliance Assistance and Pollution Prevention brochure

MR/RF/ct No PTI-PBR for GDF