

CORRESPONDENCE



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

July 27, 2009

Re: Guernsey County
Superior Hardwoods of Ohio, Inc
Facility ID # 0630010008
Complaint Investigation Letter

Emmett Conway, Jr.
Superior Hardwoods of Ohio, Inc.
P.O. Box 1358
Cambridge, OH 43725

Subject: Complaint Investigation Letter concerning Fugitive Dust created from Unpaved Roadways and Parking areas

Dear Mr. Conway:

On July 14, 2009, I performed an inspection of the Superior Hardwoods facility's unpaved plant roads and parking areas at 9911 Ohio Avenue, Cambridge, Ohio in response to a complaint this office received on July 8, 2009. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations concerning fugitive dust.

During the inspection, I met with Mr. Fred Lander, plant Operations Manager, to discuss the findings and possible solutions for the fugitive dust problems at the facility. The following observations were made:

- **Unpaved roadways and parking areas had an inordinate amount of fugitive dust**

A Method 22 observation was conducted in accordance with "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources", as such Appendix existed on July 1, 1996) on the unpaved roads and parking areas associated with the facility as a courtesy measure only. The Method 22 observations revealed the following:

The observation of visible emissions was 15 minutes and 52 seconds in an 18-minute period.

While this Method 22 observation was a courtesy, it should be noted that the dust generated at the facility is impacting your neighbors who have taken the time and effort to call my office to register a formal complaint.

Emmett Conway, Jr.
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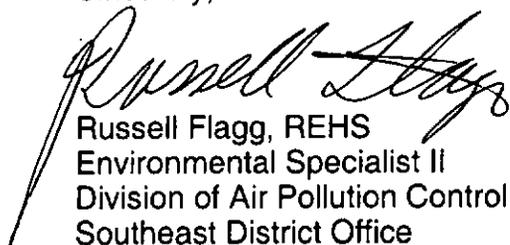
In addition, Mr. Lander and I talked about the current registration status permit issued to the facility in 1983 versus the current status of the facility. It was determined that the facility may need updated permits for lumber processing and roadways because it appears that equipment and roadways have been replaced, extended and/or upgraded throughout the facility allowing both increased material throughput and vehicle miles traveled. These changes usually result in increased emissions which can trigger permitting threshold levels.

Please evaluate all plant emissions as well as the overall permitting status and submit the appropriate permit applications, as needed, within 30 days of receipt of this letter.

Superior Hardwoods of Ohio may also qualify for the Ohio EPA Office of Compliance and Pollution Prevention (OCAPP) program. This valuable service is offered to companies that meet certain criteria of size and permitting status. If you are interested in pursuing this, please contact Ralph Witte at 740-380-5241 for assistance.

If you are unable to respond to any part of this request within the time frame discussed above, please inform me and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5229 or email russell.flagg@epa.state.oh.us.

Sincerely,



Russell Flagg, REHS
Environmental Specialist II
Division of Air Pollution Control
Southeast District Office

RF/mlm