



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

November 12, 2009

Re: Washington County  
Gillard's Custom Cabinets  
Complaint Investigation

John Gillard  
Gillard's Custom Cabinets  
1308 Greene Street  
Marietta, OH 45750

**Subject: Response to Site Visit conducted on November 4, 2009 due to complaint**

Dear Mr. Gillard:

On November 4, 2009, I conducted a site visit of Gillard's Custom Cabinets in Washington County, Ohio. The site visit was in response to a complaint received by our division on October 30, 2009. During the site visit, I spoke with you and inspected the wood working operations, paint booth area and associated controls. We discussed issues that you have had with the operation of your paint booth and wood working operation, including neighbor complaints. This letter serves as a follow up to my visit.

Upon review of my site observations and the facility's records, I have concluded the following:

1. **Paint Booth Operation** –The current permit exemptions, located in OAC rule 3745-31-03(A)(1)(kk), state that the following emissions sources are exempt from the requirement to obtain a PTI or a Permit-to-Install and Operate (PTIO):

*“Coating applicators with properly designed and operated particulate matter control devices and venting systems that employ less than five gallons of only air-dried coating material in any one day provided that the applicators are:*

- (i) *Not located in a nonattainment area for ozone,*
- (ii) *Not subject to limits specified in or not specifically exempted from rule 3745-21-09 of the Administrative Code,*
- (iii) *Not subject to federal standards of performance for new stationary sources; and*
- (iv) *Not located at a facility with actual emissions of twenty-five or more tons of volatile organic material per year and are not subject to a standard under Section 112 of the Clean Air Act.”*

I did not detect any solvent or paint-related odor on the complainant's or facility's property during my visit. From my observations, the information you provided and a review of your files, it appears that the facility's paint booth is currently exempt from needing Division of Air Pollution Control permits. Please look over the above permit exemption and confirm that your painting operation meets all the requirements for the permit exemption. However, please be aware that if the facility finds that currently or in the future the paint booth is no longer exempt from Division of Air Pollution permitting requirements, the facility should contact the agency immediately to address possible permit needs. In addition, during the site visit, it was noted that the filters that were in use were allowing excess particulate to bypass the filters of the paint booth. Ohio EPA is recommending the replacement of these filters with filters that are thicker in nature to collect additional particulate.

2. **Woodworking Operation**- The current permit exemption, located in OAC rule 3745-31-03(A)(1)(y) states that the following emissions sources are exempt from the requirements to obtain a PTI or a Permit-to-Install and Operate (PTIO):

*"Grinding and machining operations, abrasive blasting, pneumatic conveying, and wood working operations controlled with a fabric filter, scrubber, or mist collector designed to emit not more than 0.03 grains of particulate per dry standard cubic foot of exhaust gas with less than four thousand actual cubic feet per minute volume, venting inside a building, and emitting less than ten pounds per day of nonparticulate matter air contaminants."*

I observed no accumulation of sawdust on complainant's property or excess sawdust on the outside of the facility's property during my visit. From my observations and the information you provided, it appears that the facility's wood working operation is currently exempt from needing Division of Air Pollution Control permits. Please look over the above permit exemption and confirm that your wood working operation meets all the requirements for the permit exemption. However, please be aware that if the facility finds that currently or in the future the wood working operation is no longer exempt from Division of Air Pollution permitting requirements, the facility should contact the agency immediately to address possible permit needs.

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During my visit, we also discussed the current issue with odor complaints. I have enclosed some guidance that may assist you in determining voluntary best management practices in order to minimize or eliminate odors from your facility. You may also find it helpful to voluntarily contact an independent consultant/contractor who may be able to assist you in determining other practices or controls that may help with odor concerns.

Ohio EPA also provides free assistance to small business such as yours through our Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP is an independent office within Ohio EPA that was established with a goal of providing information and resources to help businesses achieve compliance with the environmental regulations. This includes a wide range of environmental regulations from air and water pollution to waste management. Another primary goal of the office is to help its customers identify and implement pollution prevention measures that can save money, increase business performance, and benefit the environment.

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OCAPP is not a regulatory program at Ohio EPA. This means that information obtained by the office is not shared with Ohio EPA inspection or enforcement staff. Some of the services they provide include a toll-free hotline, on site compliance and assessments, quarterly newsletters, and assistance in completing air permit application forms, if needed. If you would like additional information about OCAPP, please contact Ralph Witte at (740) 380-5241.

If you have any questions concerning this letter, please contact me at (740) 380-5223 or email [christina.wieg@epa.state.oh.us](mailto:christina.wieg@epa.state.oh.us).

Sincerely,



Christina Wieg  
Environmental Specialist III  
Division of Air Pollution Control  
Southeast District Office

CW/mlm

Enclosed:

Pollution Prevention Document  
OCAPP information

cc: Ralph Witte, SEDO/OCAPP  
Aaron Wolfe, SEDO/DSW  
Rich Stewart, SEDO/DHWM

Gillard's Complaint File

# 3000108

DEPA  
S.E.D.C.



State of Ohio Environmental Protection Agency

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2009 DEC 16 AM 11:48 MAILING ADDRESS:

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

December 14, 2009

Mr. Ronald Friend  
213 Fay Avenue  
Marietta, Ohio 45750-9508

Dear Mr. Friend:

Governor Strickland has asked me to respond on his behalf to your letter dated July 10, 2009 concerning Gillard's Custom Cabinets (Gillard's) located in Washington County, Ohio. First, I would like to apologize for the unacceptable delay in responding to your letter. Second, I have been advised that Ohio EPA, Southeast District Office, Division of Air Pollution Control (DAPC) and Division of Surface Water (DSW) both conducted recent unannounced inspections at Gillard's. A summary of each inspection is summarized below.

Division of Surface Water

On October 28, 2009 and November 5, 2009, DSW personnel investigated concerns outlined in your complaint. The investigations were conducted under the provisions of Ohio's water pollution control statutes. Please note that only certain sectors of industry are regulated under the general industrial storm water permit rules. As a result of the inspections, we determined that Gillard's industrial activity is not regulated under the Ohio EPA general industrial storm water permit program and DSW personnel did not find any storm water issues or violations during our inspection at Gillard's. However, DSW personnel reminded Gillard's that pollutants (e.g., oil, grease, etc.) should not be exposed to storm water. A copy of DSW's inspection letter to Gillard's is attached.

Ohio EPA also does not regulate the types of drainage issues outlined in your complaint. You may want to consult legal counsel regarding drainage issues. I have included information about Ohio Drainage Laws to assist you in moving forward with these concerns.

Division of Air Pollution Control

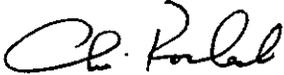
On November 4, 2009, DAPC personnel investigated the air concerns outlined in your complaint. The investigation included an inspection of the painting and woodworking operations as well as a review of the facility's records. A copy of DAPC's inspection letter to Gillard's is attached and summarized below.

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- *Paint Booth Operation.* DAPC did not detect any solvent or paint-related odors at the time of the inspection. Based on the site visit and the review of facility records, the facility's paint booth is currently exempt from air permitting requirements. The facility was cautioned that, should current operating procedures change, air permits may be required. DAPC provided guidance regarding best management practices for the minimization and control of odors.
- *Woodworking Operation.* DAPC did not observe accumulation of sawdust on the outside of the facility's property. Based on the site visit and a review of facility records, the woodworking operations are exempt from air permitting requirements. Again, the facility was cautioned that, should current operating procedures change, air permits may be required.

If you should have any questions regarding this letter, please contact Aaron Wolfe (DSW, Southeast District Office) at 740-380-5277 or Christina Wieg (DAPC, Southeast District Office) at 740-380-5233.

Sincerely,



Chris Korleski  
Director

cc: Aaron Wolfe (DSW – SEDO)  
~~Christina Wieg (DAPC – SEDO)~~

attachments

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