



Re: Allen County
Colonial Surface Solutions, Inc.
Premise No. 0302000208
Notice of Violation (non HPV)

April 30, 2013

CERTIFIED MAIL

Mr. Chad Sellman, Quality/CI Manager
Colonial Surface Solutions, Inc.
4599 Campbell Road
Columbus Grove, Ohio 45830

Dear Mr. Sellman:

This letter shall serve as a follow-up to the inspection conducted on April 18, 2013, of the above referenced facility by Jeffrey Skebba of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO). The inspection was conducted in response to an anonymous complaint alleging operations of one or more paint burn off ovens without first obtaining the proper air pollution control permit, and to determine the compliance status of all other air contaminant emissions units located there.

Based on discussions and observations during the inspection, along with a review of the company's files, my findings are as follows:

1. Two paint rack burn off ovens are being operated and include afterburners. Each oven is manufactured by Steelman Industries. Based on the serial numbers on name plates, the approximate date of installation for each is between 1997 and 1999. Each is natural gas fired, with individual maximum heat input of 1.3 million Btu per hour and 1.425 million Btu per hour.

There are no permanent exemptions from Permit-To-Install and operate (PTIO) requirements in OAC rule 3745-31-03 for these ovens. In addition, each oven has an afterburner in place to control emissions, and is subject to the appropriate particulate emission limitation in OAC rule 3745-17-09(B), depending on the maximum charge rate in pounds of product burned off per hour. Since OAC rule 3745-17-09(B) is an applicable rule and each oven meets the definition of an incinerator, the de minimis air contaminant source exemption in OAC rule 3745-15-05 cannot be claimed.

Based on the previous paragraph above, each oven should have been permitted prior to installation and are violations of OAC rule 3745-31-02(A)(1)(b). Thus, please submit a PTIO application, including cover form No. 3150a, emissions activity category form No. 3102 – Incinerator Operations, emissions calculations and a process flow diagram for each oven.

2. Coating usage records for emissions unit K001 – Paint Room were reviewed for one month at random. Several days in January 2013, had usage greater than the allowed 10 gallons per day, with a maximum on one day of 40 gallons used. Thus, the company is violating permit term 1.b)(1)a. and 1.b)(1)d. in PTIO No. P0086616 issued January 12, 2010, OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(U)(2)(e)(iii) and ORC 3704.05. Discussion during the inspection indicated that coating usage may have been in excess of 10 gallons per day for several months prior to January 2013.

The company must do the following to resolve this violation:

- Submit the past 12 months of coating usage records to document the number of days in excess of 10 gallons usage; and
 - Immediately reduce coating usage to less than 10 gallons per day.
 - Since this is a “custom job shop” facility, if production cannot be limited to less than 10 gallons per day of coatings, a PTIO modification could be obtained, as long as each coating, as applied, meets a more strict volatile organic compound (VOC) limit of 3.5 pounds per gallon for miscellaneous metal parts.
 - Provide a written statement on whether all the coatings in use are able to meet the 3.5 pounds VOC per gallon limitation and if so, submit a PTIO modification application for emissions unit K001.
3. Daily visible emissions checks and written records of these checks are required for emissions unit P001 and P002 – grit blasting operation and sand blasting operation. These records were not being kept. This is a violation of permit term d)(1) in PTIO No. P0086616 for each emissions unit.

Please submit proof that the company has developed a form for recording the visible emissions checks.

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Please submit the PTIO applications and records requested in items Nos. 1 through 3 above by June 3, 2013. The Office of Compliance Assistance and Pollution Prevention (OCAPP) may be able to assist you with preparation of the requested information. Addition information about this office can be found at <http://www.epa.ohio.gov/ocapp> or by calling OCAPP at 1-800-329-7518.

The OCAPP representative at the Northwest District Office is Mr. Ron Nabors and he can be reached at 419-373-3147 or email: ron.nabors@epa.state.oh.us

Please be advised that submission of information to respond to this letter does not constitute a 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. Should you have any questions or comments concerning this letter, please contact me at 419-373-3128 or email: jeffrey.skebba@epa.state.oh.us

Sincerely,



Jeffrey Skebba
Division of Air Pollution Control

/llr

Certified Mail Receipt Number 7009 1410 0001 1834 2283

ec: Bruce Weinberg, DAPC, Central Office
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