



**Environmental  
Protection Agency**

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

January 23, 2012

**Franklin County  
S&G Manufacturing Group  
OEPA ID: 0125042425  
Notice of Violation**

Allen Stickell  
S&G Manufacturing Group  
4830 Northwest Parkway  
Hilliard, OH 43026

**Re: Notice of Violation  
2011 Quarterly Deviation Reports**

Dear Mr. Stickell:

On April 27, 2011, August 12, 2011 and January 12, 2012, Ohio EPA Central District Office (CDO) received quarterly deviation reports for S&G Manufacturing Group. These reports were submitted pursuant to Permit to Install (PTI) 01-08088 and Permit to Operate (PTO) P0083283 for emissions units K001 and K002. S&G Manufacturing Group reported that no deviations from permit requirements occurred during the first, second and fourth quarters of 2011 (January through June and October through December 2011). However, the operating records submitted with the quarterly deviation reports show violations occurred during the reporting periods. In addition, S&G Manufacturing Group failed to submit a quarterly deviation report for the third quarter of 2011 (July through September 2011).

**1. Findings**

S&G Manufacturing Group's operating records indicate that more than 10 gallons of coatings were used in K001 on the following days in 2011: Jan. 5, Jan. 10, Jan. 11, Jan. 12, Jan. 17, Jan. 18, Jan. 20, Jan. 21, Jan. 24, Jan. 28, Jan. 31, Feb. 9, Feb. 10, Feb. 17, Feb. 21, Feb. 22, March 1, March 3, March 7, March 11, March 14, March 15, March 17, March 21, March 22, March 24, March 28, March 29, March 30, April 4, April 5, April 7, April 8, April 11, April 13, April 14, April 19, April 20, April 25, April 26, April 27, May 2, May 5, May 9, May 10, May 16, May 23, May 31, June 1, June 2, June 13, June 21, June 22 and Oct. 11.

Section B.3. of Part II of PTO P0083283 for K001 states:

*"The total coating usage shall not exceed 10 gallons in any day."*

S&G's Manufacturing Group's most recent operating permit application for K001, dated November 21, 2007, lists the coating with the highest volatile organic compound (VOC) content as a sealer with 5.06 pounds of VOC per gallon. S&G Manufacturing Group's 2011 operating records list three coatings that were used in K001 with VOC contents greater than 5.06 pounds per gallon.

The operating records do not contain the number of hours the unit operated or cleanup material usage data.

### **Violation**

The use of coatings in K001 in excess of 10 gallons per day is a violation of the terms and conditions of P0083283. Violations of the terms and conditions of an issued permit are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

Due to the lack of information provided in the quarterly deviation reports, compliance with the hourly and annual emissions limitations could not be determined.

### **Requested Action**

CDO requests that S&G Manufacturing Group prepare and submit a complete and updated Permit to Install and Operate application for K001 within 30 days from receipt of this letter. This application should identify the potential and actual emissions of the emissions unit, including all calculations, guidance, and assumptions used to develop the application.

Additionally, CDO requests a copy of the records S&G Manufacturing Group maintains to demonstrate compliance with K001's hourly and annual limits within 30 days from receipt of this letter. Specifically, please provide the total number of hours the emissions unit was in operation each day as well as the total number of gallons of cleanup material used in 2011 and the VOC content of the cleanup material, in pounds per gallon. If records are unavailable, please submit a statement that records are not available.

## **2. Findings**

Ohio EPA did not receive a quarterly deviation report from S&G Manufacturing Group for the third quarter of 2011.

Section 3.b. of Part I of PTI 01-08088 and PTO P0083283 for K001 and K002 states:

*"Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to*

*the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)"*

**Violation**

Failure to submit a quarterly deviation report for the third quarter of 2011 is a violation of the terms and conditions of 01-08088 and P0083283. Violations of the terms and conditions of an issued permit are also considered violations of ORC 3704.05(C).

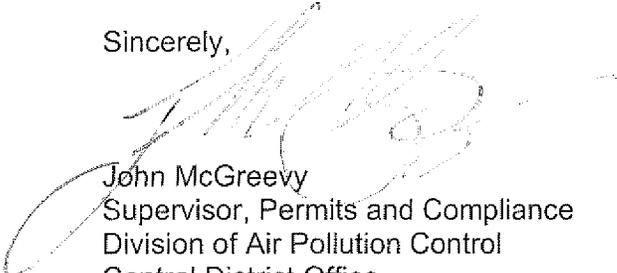
**Requested Action**

CDO requests that S&G Manufacturing Group prepare and submit a quarterly deviation report for the third quarter of 2011 within 30 days from receipt of this letter. If records are unavailable, please submit a statement that records are not available. In addition, CDO requests that any future deviations be reported in accordance with permit terms and conditions.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the ORC Section 3704.06. Submittal of the above requested information, including records and reports, does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC Section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Pam McCoy by phone at (614) 728-3810 or by e-mail at [pam.mccoy@epa.ohio.gov](mailto:pam.mccoy@epa.ohio.gov).

Sincerely,



John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

c: Adam Ward, Manager, DAPC/CDO  
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