



Environmental
Protection Agency

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

CERTIFIED MAIL # 91 7108 2133 3932 1838 4714

September 27, 2011

Franklin County
Atlas Industrial Contractors
OEPA ID: 0125042240
Air Compliance Inspection

Steve Clark
Atlas Industrial Contractors
5275 Sinclair Road
Columbus, OH 43229

**Re: Notice of Violation
2011 Compliance Inspection**

Dear Mr. Clark:

On September 19, 2011, Ohio EPA Central District Office (CDO) met with you, Dave Clark, and Tim McCarthy for the purpose of conducting a Full Compliance Evaluation (FCE) of Atlas Industrial Contractors (Atlas), in Columbus, Ohio. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations.

A review of the following emissions units comprised the compliance evaluation of your facility:

K003 – fabricated structural components surface coating line
P002 – shot blaster with Jet Air Fabric Filter
F001 – roadway and parking area

A synthetic minor permit to install (01-08013) was issued to Atlas on March 22, 2001. This permit contains terms and conditions for emissions units K003.

Compliance was assessed based upon an examination of each emissions unit at the facility, an examination of monitoring and record keeping files maintained at the facility, and a review of compliance reports and fee emissions reports maintained at CDO. Below is a summary of the inspection findings, violations and action items that need to be addressed.

Finding 1: Failure to maintain spray booth exhaust filters

During the facility compliance evaluation on September 19, 2011, CDO personnel observed the spray booth exhaust filters in the southwest corner of the building needed to be changed. The issued permit states:

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

"This emissions unit shall be operated and maintained in accordance with the manufacturer's recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per the manufacturer's recommendation in order to maintain the highest effective level of particulate emissions control."

Violation

Operation of emissions unit K003 without properly maintained exhaust filters is a violation of the terms and conditions of Permit-to-install (PTI) 01-12084. Violations of the terms and conditions of an effective permit are also considered violations of ORC 3704.05(C).

Requested Action

CDO requests that Atlas purchase a replacement filter and submit a copy of the purchase order to CDO, Division of Air Pollution Control, within 30 days of receipt of this letter. In the future, Atlas should maintain and regularly replace exhaust filters in accordance with the terms and conditions of PTI 01-08013.

Finding 2: Failure to perform monitoring and recordkeeping

A review of Atlas's records indicated that the following monthly recordkeeping was not being maintained in accordance with the indicated sections of Atlas's permits.

Permit	Emissions Unit	Section(s)	Requirement
01-08013	K003	C.3.c.	the rolling, 12-month summation of the cleanup solvent used
01-08013	K003	C.3.f.	the rolling, 12-month summations of the individual and total HAP emissions from all coating materials and cleanup solvents used
01-7854	P002	C.1.	The permittee shall record the pressure drop across the baghouse once every shift.

Violation

Operation of emissions units K003 and P002 without maintaining required records is a violation of the terms and conditions of PTI 01-12084 and PTI 01-7854. Violations of the terms and conditions of an effective permit are also considered violations of ORC 3704.05(C).

Requested Action

Atlas should immediately begin maintaining the above mentioned records for K003 and P002 in accordance with the applicable permit terms and conditions. Ohio EPA requests that Atlas submit a copy of the updated rolling, 12-month summations for K002 and 30 consecutive days of pressure drop readings for P002 to CDO, Division of Air Pollution Control, within 30 days of receipt of this letter.

Finding 3: Failure to submit quarterly compliance reports

A review of CDO's records established that the following compliance reports were not submitted in accordance with the indicated sections of Atlas's permits.

Permit	Emissions Unit	Section(s)	Report(s)
01-08013	K003	D.2.	2 nd -4 th 2001 Quarterly 1 st -4 th 2002 Quarterly 1 st -4 th 2003 Quarterly 1 st -4 th 2004 Quarterly 1 st -4 th 2005 Quarterly 1 st -4 th 2006 Quarterly 1 st -4 th 2007 Quarterly 1 st -4 th 2008 Quarterly 1 st -4 th 2009 Quarterly 1 st -4 th 2010 Quarterly 1 st -3 rd 2011 Quarterly

Violation

Failure to submit timely quarterly reports is a violation of the terms and conditions of PTI 01-08013. Violations of the terms and conditions of an effective permit are also considered violations of ORC 3704.05(C).

Requested Action

Ohio EPA requests that Atlas submit all above mentioned reports and all future reports in accordance with the terms and conditions of PTI 01-08013. The reports shall be submitted within 30 days of receipt of this letter.

Atlas is a Synthetic Minor Title V (SMTV) facility and is required to submit permit applications and reports via the eBusiness Center: Air Services, which is accessed through the eBusiness Center. The eBusiness Center may be reached from the Ohio EPA home page at <http://www.epa.ohio.gov> or directly at <http://ebiz.epa.ohio.gov>.

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Atlas Industrial Contractors
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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.

For compliance assistance, I encourage you to contact Dan Sowry in the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 728-8575 or via e-mail at dan.sowry@epa.state.oh.us. OCAPP provides free and confidential assistance to small business to help resolve violations and maintain compliance with Ohio EPA's rules.

If you have any questions, please do not hesitate to contact Stephanie Habinak by phone at (614) 995-0673 or by e-mail at stephanie.habinak@epa.ohio.gov.

Sincerely,



Kelly Toth
Supervisor, Permits and Compliance
Division of Air Pollution Control
Central District Office

c: John Paulian, DAPC/CO
Adam Ward, DAPC/CDO
Stephanie Habinak, DAPC/CDO
ec: John McGreevy, DAPC/CDO