



**Environmental
Protection Agency**

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

Re: Seneca County
Ameriwood Industries
Premise # 0374020106
Notice of Violation (non-HPV)/
Return to Compliance

May 15, 2012

Mr. Ed Ollom, EHS Manager
Ameriwood Industries
458 Second Avenue
Tiffin, Ohio 44883

Dear Mr. Ollom:

This letter shall serve as a follow-up to the complaint investigation conducted on Monday, May 7, 2012, of the above-referenced facility by Miranda Garlock and Mohammad Smidi from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO). The purpose of this investigation was to determine the legitimacy of the complaint received on Thursday, May 3, 2012, of dust being emitted from the facility and impacting off-site residential properties.

1. The facility provided the Ohio EPA, DAPC with a copy of an incident report. According to information supplied by the facility, a malfunction to the Seneca baghouse #6 (emission unit P020) occurred on May 2, 2012, at approximately 12:00 p.m. which lasted eight minutes. According to the facility, P020 is the air pressure vent for the silo. According to the facility, the release was the result of sawdust filling P020 until it was plugged which caused the relief/blast door to open at the top of the silo releasing sawdust. Most of the release was contained to the courtyard on the facility's property.

Because the facility did not contact the Ohio EPA regarding the malfunction of P020 and the associated release of particulates due to its failure, the facility was not in compliance with Ohio Administrative Code (OAC) rule 3745-15-06(B) as referenced in Permit No. P0105591, effective December 29, 2009, in No. 10 of the Standard Terms and Conditions.

2. As defined in OAC rule 3745-15-06(B)(1)(c), in the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law, the nature and estimated quantity of air contaminants which have been or may be emitted into the ambient air during the breakdown period must be supplied to the Ohio EPA.

Therefore, the Ohio EPA requests that the facility provide the estimated emissions which resulted as part of the malfunction that occurred on May 10, 2012. It should be noted that the facility should account for these additional emissions when submitting the 2012 Fee Emission Report (FER) the following year.

3. The review of the facility's records and reports indicate that Ameriwood Industries has maintained and submitted all required information in accordance with the terms and conditions of the facility's operating permits. All emissions units appear to be in compliance with air pollution control emission limitations and regulations of Ohio EPA at this time.
4. The complainant indicated they had concern over the possible exposure to formaldehyde in medium density fiberboard (MDF) used at the facility; therefore, the facility was asked to provide information regarding formaldehyde use in its products. The facility provided two Material Safety Data Sheets (MSDS) for the particle board most widely used at the facility. According to both MSDS sheets, the amount of formaldehyde in the MDF is less than 0.1%. In addition, as an Occupational Safety and Health Administration (OSHA) requirement, the facility conducts air monitoring surveys approximately every six months for employees that would have the greatest likelihood of formaldehyde exposure. The last air monitoring survey was conducted on December 20, 2011, on one worker in the board warehouse and one worker near the laminator in feed. Each worker was screened for approximately 6.5 hours. The results indicated that the formaldehyde concentration was below detection limits [<0.040 parts per million (ppm)] and did not exceed the OSHA Permissible Exposure Limits (PEL) of 0.75 ppm.

Based on the information provided by the facility, the amount of formaldehyde within the MDF used at the facility is minimal and does not appear to be adversely impacting employees' health based on OSHA air monitoring results. The facility is taking measures to use the lowest concentration of formaldehyde MDF in their products and continues to monitor employees potential exposure risk through routine air monitoring.

Because the facility internally recorded the May 2, 2012, incident and had taken measures to stop the release and repair the equipment malfunction, the incident has been resolved and no further action is required. The facility should be attentive in the future to notify the Ohio EPA immediately upon such a failure or breakdown. In addition, the Ohio EPA requests a written response to number 2 by May 29, 2012.

Mr. Ed Ollom
May 15, 2012
Page 3

Please note that this does not preclude the Director from seeking civil penalties pursuant to ORC Section 3704.06 for this violation. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

I would like to thank you for the courtesy extended during our visit. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

pc: DAPC-NWDO File

ec: Miranda Garlock, NWDO, DAPC
Mohammad Smidi, NWDO, DAPC
Andrea Odendahl, NWDO, DAPC
Jennifer Jolliff, NWDO, DAPC
Bruce Weinberg, CO, DAPC
William MacDowell, US EPA