

Environmental
Protection Agency

John Kasich, Governor
Paul Tate, Lt. Governor
Scott J. Smith, Director

September 13, 2011

CERTIFIED WARNING LETTER

Mr. Maylon Miller
Riceland Cabinet Corp
326 North Hillcrest Dr.
Wooster, OH 44691

RE: Certified Warning Letter for Title V and MACT Subpart JJ Recordkeeping Violations; DAPC Facility ID: 02 85 03 2001

Dear Mr. Miller:

Thank you for your time on August 17, 2011, when I inspected Riceland Cabinet. The purpose of the inspection was to determine compliance with the facility's current Title V operating permit, permit-to-install (P TI) P0 105242 and Subpart JJ- Wood Furniture Manufacturing Operations MACT. During the inspection some violations of the facility's Title V permit and Subpart JJ became evident and recommendations to correct these violations were provided to you and Mr. Ed Tinoco, of ChemTech Consultants.

I have reviewed the additional information provided on August 26 by e-mail on behalf of Riceland Cabinet Inc. by Mr. Tinoco. However, additional actions need to be taken to return Riceland Cabinet Inc. to compliance with the facility's Title V operating permit and Subpart JJ- Wood Furniture Manufacturing Operations MACT.

Certified Product Data Sheet Management Needed

According to the rule and the permit, the owner is required to maintain records of the certified product data sheet for each finishing material, thinner, contact adhesive and strippable spray booth coating subject to the emissions limits and must maintain the VHAP content in mass of VOC per mas of solids, as applied.

During the inspection, the Certified Product Data Sheets for the coatings, cleanup materials and adhesives were not available as required by Subpart JJ, 63.806(b)(1), and in contradiction of Riceland Cabinet's Title V operating permit term d)(3) for each coating and laminating emissions unit.

- Please compile the CPDS for each finishing material, thinner, contact adhesive and strippable spray booth coating on-site at Riceland Cabinet **by September 30, 2011.**

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I'm also requesting that a plan be established to ensure that a CPDS is maintained on site for each new or reformulated finishing material, thinner, contact adhesive and strippable spray booth coating prior to the material being employed.

- Please describe Riceland Cabinet's plan to ensure that a CPDS is maintained on site for each new or reformulated finishing material, thinner, contact adhesive and strippable spray booth coating.

Re-evaluation Compliance with HAP Limitations Needed

Without a certified product data sheet for each finishing material, thinner, contact adhesive and strippable spray booth coating compliance with the emission standards in Table 3 of Subpart JJ could not be verified.

- Please verify all VHAP containing materials comply with the emission limitations for Existing Sources in Table 3 to Subpart JJ.
- Please confirm with me the compliance status of each finishing material, thinner, contact adhesive and strippable spray booth coating.
- Please describe Riceland Cabinet's plan to ensure that each new or reformulated finishing material, thinner, contact adhesive and strippable spray booth coating meets the VHAP standard in Table 3 to Subpart 63.

Documentation of Work Practice Implementation Plan Implementation Needed

Documentation required to demonstrate that the provisions of the work practice implementation plan, leak inspection and maintenance plan have not been maintained as required by Subpart JJ, 63.806(e)(6) and 63.803(c) and in contradiction of Riceland Cabinet's Title V operating permit term d)(9) and b)(2)b. for each coating and laminating emissions units.

According to Ed Tinoco's August 26, 2011, e-mail, the daily material usage recordkeeping sheets have been revised to include the results of the required leak detection, maintenance and work practice inspections.

- Please provide a copy of the revised recordkeeping sheet and a confirmation of the date the inspections began.

Operating Training Course and Refresher Training Needed

Riceland Cabinet's Title V operating permit requires that an operating training course be established to review the requirements of Subpart JJ upon hire and annually thereafter. The annual refresher course has not been provided to the operators, in violation of Subpart JJ, 63.803(b) and in contradiction of Riceland Cabinet's Title V permit term (b)(2)b.

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- Please provide a copy of the lesson plans for the operator training and refresher courses as required by 63.803(b).
- Please complete the operator refresher training by September 30, 2011 and inform this office the date the training was conducted.
- Please establish a plan to complete the refresher annually and a method to document the information required in Subpart JJ, 63.803(b).

Revised Monthly VOC and HAP Emissions Recordkeeping Needed

Riceland Cabinet's Title V operating permit requires that monthly records of the VOC and HAP emissions from each coating be maintained. The monthly VOC and HAP recordkeeping spreadsheet created by ChemTech to track Riceland Cabinet's emissions group's coatings together and does not accurately reflect Riceland Cabinet's actual emissions, in violation of B.7 of Riceland Cabinet's Title V operating permit.

- Please revise the spreadsheet to reflect the use of 1501 Solvent and not MEK.
- Please revise the spreadsheet to reflect the actual material employed rather than grouping materials together by "stains," "FVT Paints," etc. Materials employed can only be grouped if the Certified Product Data Sheet formulations are identical.
- Please provide the revised spreadsheet by **September 30, 2011**.

Cleanup Material Replaced to Correct Violation

Riceland Cabinet's Title V operating permit requires that any cleanup material contain no VOC or HAP as part of the synthetic minor strategy. The 1501 Solvent employed since 2009 contains both VOC and HAP, in contradiction of term B.4. of Riceland Cabinet's Title V operating permit and PTI P0105242. According to the August 26, 2011, e-mail, the 1501 Solvent was replaced with MEK.

- Please provide the exact date that 1501 Solvent usage was terminated and the name and Certified Product Data sheet for the replacement.

Revised Title V Annual Compliance Certification Needed

Although the facility was in violation of multiple requirements, the 2009 and 2010 Annual Compliance Certifications certified continuous compliance with all the permit terms.

- Please revise the 2009 and 2010 Annual Compliance Certification to reflect the non-compliance with term B.4 requiring cleanup material to contain no VOC of HAP.

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- In addition, the Annual Compliance Certification should be revised to reflect that the monthly Work Practice Inspections were not documented, the CPDS were not updated and available, and the annual employee work practice training was not complete and documented.
- Please submit the revised Annual Compliance Certifications through Air Services by **September 30, 2011**.

I look forward to Riceland Cabinet completing the corrective actions by September 30, 2011 and a confirmation of these actions submitted to this office by **October 4, 2011**. Should you have any questions concerning this letter, please contact me at (330) 963-1298.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

cc: Misty Koletich, DAPC-NEDO
Tim Fischer, DAPC-NEDO
Ed Timoco, ChemTech Consultants