Environmental
Protection Agency
Governor
Lt. Governor
Director

August 26, 2011

RE: NOTICE OF VIOLATION
HIGH PRIORITY FACILITY GC7

CERTIFIED MAIL

Mr. Brian Schrock, President
Schrock's Woodcraft – Plant 2
4981 Township Road 401
Walnut Creek, OH 44687

Division of Air Pollution Control Compliance Evaluation for the operations located at 4981 Township Road 401, Walnut Creek, Ohio - DAPC Facility ID No. (02-38-00-0150)

Dear Mr. Schrock:

On 8/11/2011, Ohio EPA (OEPA) representative Christine McPhee visited the above-named site to determine compliance with the permits issued by the Division of Air Pollution Control (DAPC), and other applicable requirements. The time and courtesy given by you was greatly appreciated.

The purpose of this letter is to provide a follow-up to the inspection. We found violations of the following record keeping requirements: cleanup solvents usage and cleanup emissions at each coating operation (R004 – R010); the rolling 12-month emissions from all coating operations (R004 – R010), combined; and the differential pressure drop of the baghouse that serves the wood working operations (P001). Additional information and/or revisions to the current record keeping programs are requested by **9/14/11** and are discussed below.

Record Keeping and Monitoring Requirements

R009 - stain coating spray booth, oven drying of parts on conveyor
R008 - sealer coating spray booth, oven drying of parts on conveyor
R007 - 1st top coat spray booth, oven drying of parts on conveyor
R006 - 2nd top coat spray booth, oven drying of parts on conveyor
R005 - (Off line/non-conveyor) stain and sealer coating spray booth, air drying of parts
R004 - (Off line/non-conveyor) top coat spray booth, air drying of parts
R010 - (Off line/non-conveyor) top coat spray booth, air drying of parts

Permit-to-Operate (PTO) term C.1. requires a daily record when dry filters were not employed whenever a spray coating emissions unit (EU) is operated. There are no records to document when a dry filter was not employed at a booth. We understand that dry filters are typically employed.

1. In order to clarify compliance status, OEPA requests that the "Finish Usage" sheet form be revised to include a remark about coating overspray filter usage.

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PTO term C.3. requires monthly records of net cleanup material usage and volatile organic compound (VOC) emissions for each of R004 – R010. During the 8/11/2011, site visit, it was discovered that these records are not kept on a per booth basis.

2. OEPA requests that a cleanup solvent usage and emissions record keeping program be created to track monthly cleanup solvent usage and VOC emissions on a per booth basis.

3. Please submit a revised record form (e.g. Finish Usage form) that includes the requested revisions in item nos. 1 and 2.

4. Please submit documentation (e.g. MSDS) of the composition of the cleanup material(s) that includes the VOC content, and the hazardous air pollutant (HAP) content.

R004 – R010, Combined

Monthly VOC emissions from cleanup materials usage are not included in the monthly VOC emissions from the all the booths combined, which is a deviation a PTO term C.4.a. Rolling 12-month VOC emissions from all the booths combined are not estimated and recorded, which is a deviation of PTO term C.4.b. Additionally, monthly emissions of each single HAP and of combined HAPs are not recorded from all booths, combined which is a deviation of PTO terms C.5.e. and C.5.h., respectively. The rolling 12-month emissions records are required for documentation of the compliance status of the permit requirements that limit the facility's potential to emit at below major source levels.

5. OEPA requests that record keeping procedures be revised to generate rolling 12-month emissions records for single HAPs, combined HAPs and VOCs from all booths combined.

6. Please submit a record of the rolling 12-month emissions of each single HAPs, combined HAPs and VOCs from R004 – R010, combined, for each month for the 1/2009 – 6/2011 period. Do identify the single HAP compounds in the record.

A review of the annual emissions compliance reports found that annual emissions from all booths combined did not exceed the rolling 12-month limits for VOCs, single HAPs or combined HAPs.

(P001) Woodworking shop with a baghouse to control particulate emissions

Weekly "Dust Monitoring" records for the 3/2008 – 8/10/11 period show that no visible PE were seen from the baghouse, which exhausts back into the plant. However, we found no records of the baghouse pressure drop readings, required by PTO term C.1.

7. OEPA requests that "Dust Monitoring" record keeping forms be revised as follows:
   a. Include an explanatory note to state that there is no egress to the ambient air since the baghouse exhausts back into the woodworking shop (P001) so that a visible emissions observation of the exhaust stack is not applicable. Schrock's may wish to identify particular observation point(s) to check for leaks in the dust duct work to and from the baghouse; and

b. If the baghouse pressure drop readings are recorded in another record form besides the "Dust Monitoring" records, please provide a copy of the records for the 6/01/2011 – 8/11/2011 period by **Wednesday, 9/07/2011**. Otherwise revise the "Dust Monitoring" record form to include a record of the observed differential pressure drop on the baghouse.

(P002) wood waste storage silo with a cyclone to control particulate emissions (PE)
Weekly "Dust Monitoring" records for the 3/2008 – 8/10/2011 period show that no visible PE were seen from the silo. There are no explanatory notes on the record form to indicate that observations of visible emissions of the silo load-out to the truck operation should be made, as required by PTO term C.1. The "Dust Monitoring" record form does not have specific items to note deviations from the requirement to employ dust control measures for silo load-out to a truck as required by PTO term C.2.

8. OEPA requests that "Dust Monitoring" record keeping forms be revised as follows:
   a. Include an explanatory note to state that the silo load-out operation to a truck is to be observed for (fugitive) visible emissions;

   b. Include a remark about the employment of dust control measures for the silo load-out operation (e.g. telescoping discharge chute, high side boards on the truck or a partial enclosure, and use of a cover over the discharge chute); and

   c. a log of time periods when the wood waste bin was not vented to the closed loop system during silo load-in operations.

B003 – 15.6 mmBtu/hr (sawdust) wood-fired boiler with a multi-cyclone to control PE
A review of records for the 1/02/2009 – 7/29/2011 period found that a daily visible emissions (VE) check of the cyclone stack exhaust is recorded per PTO term C.1. The duration of certain boiler operations were not specified, so that the period when the boiler's cyclone exhaust is exempt from the opacity limit is not documented as required in PTO term C.2. Although a maintenance log is included as required by PTO term C.3., explanatory notes may be added so that remarks about the operation and maintenance of the multi-clone are included.

9. In order to clarify what actions need to be taken and recorded if VE are seen, OEPA suggests that a note be added to the "Boiler System Monitoring" form to record the following information whenever VE are seen during an observation of the cyclone exhaust gas stack:

   a. The color of the emissions;

   b. Whether the emissions are representative of normal operations, the cause of abnormal VE;

   c. The total duration of any VE incident; and

   d. Any corrective actions taken to minimize or eliminate the VE.

10. Please include the following modifications to the "Boiler System Monitoring" form:

a. The date and time periods for the following boiler operations:
   i. start-up (of a cold combustion chamber until the optimum temperature is reached);
   ii. shutdown (of the combustion chamber);
   iii. c. malfunction of boiler or control equipment (multi-clone);
   iv. intermittent soot-blowing operations (or add a note to state that the boiler is automatically controlled so that sootblowing is monitored by the electronic boiler controller and occurs periodically for each of 8 tubes);
   v. intermittent ash removal operations (from the boiler combustion chamber); and
   vi. the commencement of increased fuel firing from a banked condition; and

b. Explanatory notes regarding operation and maintenance work performed on the boiler as well as the multi-clone control device.

Reporting Requirements

A review of the annual fee emissions reports for the 2009 and 2010 calendar year periods, we found that for spray coating operations that had reportable emissions of at least 1 ton/yr of any reportable pollutant that only emissions from one operation "Solvent in Coating" were reported. It is not apparent that the emissions from the use of cleanup solvent materials are included for R004 – R010, as required by OAC rule 3745-78-02(F).

11. For the 2011 calendar year fee report, due 4/15/2012, do include emissions estimates for each operation that generates air pollutant emissions at each emissions unit.

Facility Profile Update Requests

In order to show an accurate representation of the design of process equipment and air pollution equipment, OEPA requests that the facility profile in Air Services of eBusiness be updated.

The facility profile shows that the wood working shop (P001) baghouse exhaust is routed to a cyclone rather than into the wood working shop.

12. Please correct the P001 baghouse air exhaust destination to the appropriate egress (fountain icon):
    a. If appropriate, go to the "Schrock's Torit" process operation (single gear icon) and at the bottom of the page, select "Edit" to disassociate the link from the process operation to the cyclone; and
    b. If appropriate, create a wood working shop egress and associate to the baghouse.

The facility profile shows that the sawdust storage silo (P002) has a silo process operation (for sawdust load-in to the silo) that exhausts to a "back silo" control device rather than a cyclone control device.

13. Please correct the silo process operation association to the appropriate control device (e.g. cyclone) that would exhaust to a cyclone egress.

14. Please create another process operation for P002 for the sawdust load-out to a truck with a fugitive egress from the doorway of the partial enclosure.

15. Please create a process operation for P002 for the sawdust transfer from the storage silo to B003. The silo process operation may have the sawdust transfer process operation associated to it.

If available, please submit wood working shop baghouse pressure drop records to this office by 9/07/2011. Please submit the information requested in item nos. 1 through 10 by **9/14/2011**. Facility profile updates, discussed in item nos. 11 – 15, are requested by 9/27/11. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency.

Please be advised that acceptance by Ohio EPA of any compliance plan does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3745.06. The determination to pursue further action will be determined by Ohio EPA at a later date.

Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.state.oh.us.

Sincerely,

Christine McPhee

Christine McPhee
Environmental Specialist
Division of Air Pollution Control

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