



**Environmental  
Protection Agency**

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

Re: Erie County  
Ohio Veterans Home  
Premise No. 0322020095  
Notice of Violation (NOV/non-HPV)

June 25, 2012

**CERTIFIED MAIL**

Mr. Jeff Wright  
Ohio Veterans Home  
3416 Columbus Avenue  
Sandusky, Ohio 44870

Dear Mr. Wright:

In an effort to update your facility profile in our web based program, Air Services, Ohio EPA, Division of Air Pollution Control (DAPC) has recently reviewed your facility files. Based upon our review of the facility records and out discussion on June 21, 2012, the following conclusions have been reached:

1. Ohio Veterans Home (herein referred to as OVH) is currently operating three natural gas fired boilers (emission units B004, B005, and B006) under three separate Permit to Operate (PTO) permit numbers P0024516, P0024517, and P0024518, which were all issued on August 4, 1995. All three PTOs expired on August 4, 1998.
  - a. This office does not have any record that a PTO application was received for B004, B005, or B006 upon expiration of their respective PTO permits on August 4, 1998. Therefore, the facility is required to submit a Permit to Install/Operate (PTIO) application for B004, B005, and B006. Please submit updated applications for all contaminant sources that are currently operational at the facility. A complete application for each air contaminant source would include a PTIO application (Form 3150a), the appropriate Emissions Activity Category (EAC) form for our operations, a process flow diagram, and emissions calculations. These forms can be found on the web at <http://www.epa.ohio.gov/dapc/fops/eac/eacfoms.aspx>.

Because your facility is a Non-Title V facility, you may submit applications via mail or electronically on the web based eBusiness Center: Air Services program. Information on this web based program can be found at <http://www.epa.ohio.gov/dapc/airservices.aspx>.

- b. PTO requirements for the three natural gas fired boilers require the submittal of quarterly compliance reports. The last compliance report received from the facility was dated February 17, 2005, for the fourth quarter of 2004. OVH is in violation of the terms and conditions of issued PTOs P0024516, P0024517, and P0024518. OVH has failed to submit any quarterly compliance reports, as required in the PTO General Terms and Conditions 1)(c)(3), since the first quarter of 2005 until the present. OVH is required to submit quarterly reports for B004, B005, and B006 since January 2005.
  - c. It is unknown whether OVH has maintained any compliance with operating, monitoring, or record keeping requirements in the permit since no compliance reports have been submitted since the fourth quarter of 2004 to the present.
2. OVH was issued a Permit to Install (PTI) on August 22, 1990, for emission unit G001 which included: one, 1,000-gallon leaded gasoline underground storage tank (UST); one, 6,000-gallon unleaded gasoline UST; and two, 20,000-gallon fuel oil USTs. In accordance with OAC 3745-31-03, these tanks would now qualify for a permit exemption. I have updated your facility profile in Air Services to reflect this change.

OVH is required to submit the information detailed in No. 1(a) and No. 1(b), no later than July 25, 2012. Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC Section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

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](mailto:Miranda.Garlock@epa.ohio.gov).

Sincerely,



Miranda R. Garlock  
Division of Air Pollution Control

pc: DAPC-NWDO File  
Certified Mail Receipt Number 7009 1410 0001 1834 3716

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