



**Environmental
Protection Agency**

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

Re: Seneca County
Ameriwood Industries
Premise # 0374020106
Notice of Violation (non-HPV)
Resolution of Violation

September 11, 2012

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

Dear Mr. Ollom:

As you are aware, the Division of Air Pollution Control (DAPC) received an anonymous complaint on Friday, August 31, 2012, at approximately 3:30 p.m. The complainant indicated that at approximately 5:45 a.m. on August 31, 2012, a substantial release was observed coming from the silo at the facility. As of Tuesday, September 4, 2012, a response from Ameriwood Industries (Ameriwood) concerning the possible release had not been reported to DAPC personnel. Therefore, on September 4, 2012 at approximately 10:28 a.m., Miranda Garlock of DAPC sent an email to Ameriwood inquiring about a possible release occurring on August 31, 2012. Ameriwood responded on September 4, 2012 at approximately 2:39 p.m. via email confirming that a possible release had occurred that involved the silo during third shift. Ameriwood provided some details regarding the incident to DAPC on September 5, 2012 via email and provided a Final Incident Report to DAPC via email on September 7, 2012.

According to the Final Incident Report provided by Ameriwood, particulate emissions were released from the silo pressure vent from at least 5:53 a.m. (the initial observance of emissions from an employee) until at least 7:00 am (when the energy sources to the dust collectors were locked out prior to the shift change) on August 31, 2012. Ameriwood indicates that the release was caused by a defective pressure vent. The pressure vent is made of Styrofoam and upon inspection, the integrity of the lower left quadrant appeared to have been compromised. The vent was removed and replaced.

Ameriwood estimates that approximately 10 to 50 pounds of particulate matter was released from the impaired pressure vent on the silo. Ameriwood's estimation is based on the minimal amount of cleanup that was necessary, the absence of dust on employee cars, the minimal production rate that occurred on third shift and the limited amount of damage observed on the pressure vent.

Ameriwood confirms that the release did result in an exceedence of particulate emissions because the amount of material observed by two employees was significant enough to be seen from at least 100 yards away. Emission unit P020, or Seneca #6, serves as the vent for the silo. This emissions unit has an hourly permit limitation of 0.15 pound particulate matter less than or equal to 10 microns (PM10)/hour with an opacity limitation of 0%, as a six-minute average from the dust collector stack when emissions are exhausted outside.

Based upon the review of the Final Incident Report, Ameriwood is found in violation of the following:

1. The degradation of the Styrofoam pressure vent could have been avoided with proper scheduled maintenance which would have prevented a malfunction from occurring. Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. Based upon Ameriwood's evaluation of the equipment breakdown/operational upset, a reportable malfunction occurred on August 31, 2012 associated with P020. In accordance with OAC Rule 3745-15-06, and as referenced in Permit No. P0105591, effective December 29, 2009, in No. 10 of the Standard Terms and Conditions, 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 person responsible for such equipment shall immediately notify the Ohio EPA District Office of such failure or breakdown.

Because Ameriwood did not contact the Ohio EPA regarding the malfunction and the associated release, Ameriwood violated OAC Rule 3745-15-06 and ORC section 3704.05. In addition, this is Ameriwood's second repeat violation of OAC Rule 3745-15-06 since May 7, 2012.

Because the facility internally recorded the August 31, 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.

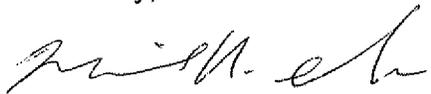
In a letter dated August 21, 2012, Ohio EPA requested that Ameriwood prepare a Preventative Maintenance and Malfunction Abatement Plan because the amount of equipment breakdowns and reported malfunctions in Ohio EPA's judgment has been excessive. Ohio EPA believes Ameriwood needs to take a more proactive approach in preventing potential releases instead of reacting and correcting the potential release after it has already occurred. Ameriwood is required to submit and implement a Preventative Maintenance and Malfunction Abatement Plan to Ohio EPA by September 20, 2012.

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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.

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

ec: Miranda Garlock, NWDO, DAPC
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